

Data Retention Schedule

A. EMPLOYEE HR RECORDS 2

B. FINANCE 5

C. PAYROLL 7

D. MARKETING 9

E. SUBSCRIPTIONS 10

F. MISCELLANEOUS INTERNAL PROCESSES 12

A. Employee HR records

Type of Material	Minimum Retention Period	Reason
Material that is constantly updated, such as an employee's home address	Personal employee details will be stored and updated. Previous records will be deleted.	Data Protection Principles
Recruitment and selection materials of rejected candidates	12 months after the decision	The time limit for claim of discrimination, Employment Practices Code Part 1
Job Applications and selection materials of successful candidates	Length of employment plus 6 years.	Company Policy
Criminal Background Checks (CBC) (where you are allowed to collect this data)	Length of employment plus 6 years. Checks on unsuccessful candidates: 6 months.	Company Policy
Identification documents of foreign nationals (obligation to retain copies to perform immigration checks)	Minimum 2 years	Article 6 Immigration Restriction on Employment Order 2007
Expat records and other records relating to foreign employees (eg. Visa work permit)	6 years after employment ceases	Section 5 Limitation Act 1980
Checks (such as references) made before taking someone on and any required copies of documents	6 years after the contract ends	Evidence that checks were made

Copy of identification documents for Right to Work Checks	6 years after employment ceases	Section 5 Limitation Act 1980
Correspondence	When this contains personal data, this should be deleted as soon as personal data processed	GDPR principle, DPA 5th principle
Incidental correspondence with staff members	One year after the matter is closed	Data Protection Principles
Material forming part of an employment contract, changes to T&C's	6 years after the contract ends (or after that provision is superseded)	The time limit for legal claim Section 5 Limitation Act 1980
Data concerning a temporary worker	6 years after employment ceases	Section 5 Limitation Act 1980
Leave and absence, including sick leave records	6 years	May be relevant to claims of under-payment, unlawful deductions or breach of contract Section 5 Limitation Act 1980
Registration of work and rest periods if required if an obligation exists to show compliance	Minimum retention period 2 years	Working Time Regulations 1998
Essential medical data required for employment purposes	Length of employment plus 6 years.	DPA 2018
Occupational health data and referrals	Length of employment plus 6 years.	The Health and Safety at Work Act 1974
Pension-related records	12 years from the end of any payable benefit.	Consult pension provider

Performance records (such as training or appraisal)	6 years after employment ends	The time limit for a legal claim
Maternity and paternity records	5 years from birth or adoption	Employment Rights Act 1996
TUPE records (for employees who have transferred employer)	Length of employment plus 6 years	Transfer of Undertakings (Protection of Employment) Regulations 2006
Disciplinary records	6 years after employment ends	The time limit for a legal claim

B. Finance

Type of Material	Minimum Retention Period	Reason
Accounting records (including; bank statements and reconciliations; payment and receipt records; supplier/accounts payable invoices; customer/accounts receivable invoices; customer debit notes; purchase and sales ledger; and employee expense records)	6 years past the end of the financial year to which they relate	Companies Act 1985 as amended by the Companies Acts 1989 & 2006. Generally Accepted Accounting Practice (UK GAAP).
Accounting record (including audit): Taxation	10 years from tax year end or as required in the event of a tax investigation	As above
Annual audited financial statements and report	Life of Group entity	As above
Interim financial statements	Life of Group entity	As above
Internal financial statements	7 years from the financial year end	As above
Annual plans and budgets	7 years from the financial year end	As above
VAT records	7 years from tax year end	Value Added Tax Act 1994 (as amended).
Corporation tax self-assessment records	7 years from tax year end	Taxes Management Act 1970.
Stamp duty land tax records	7 years from tax year end	Paragraph 9, Schedule 10, Finance Act 2003 (as amended).

Landfill tax records	7 years from tax year end	The Landfill Tax Regulations 1996 (as amended).
Insurance premium tax records	7 years from tax year end	The Insurance Premium Tax Regulations 1994.
Charitable donation records	<p>Records re sponsorship arrangements or partnerships with third party charities:</p> <p>6 years after the date of last payment but up to 12 years if any payments are still outstanding or there are disputes regarding a document executed as a deed.</p> <p>Documents evidencing donations made to charitable organisations: public companies: 6 years</p>	Section 388(4) Companies Act 2006.
Banking records:		
Cheques and other negotiable instruments	Originals	6 years from date of issuance
Paying-in counterfoil		
Bank statements and reconciliations	Originals	6 years from date of issuance
		Public Companies: 6 years

Instructions to bank	Original if provided in hardcopy or otherwise if statements obtained via internet banking, on-line printouts Both	Private Companies: 3 years 6 years after ceasing to be effective
Contracts (underhand) and relevant correspondence and other related documents (such as PO, credit checks)	End of contract plus 7 years (or to the end of any warranty or service periods, if longer)	Limitation Act 1980.
Contracts (executed as a deed) and relevant correspondence and other related documents (such as PO, credit checks)	End of contract plus 13 years (or to the end of any warranty or service periods, if longer)	Limitation Act 1980.
Tenders/bids for contracts made by Group / Entity (successful)	End of contract plus 7 years (or to the end of any warranty or service periods, if longer)	Limitation Act 1980.
Tenders/quotes from suppliers (unsuccessful)	Last correspondence plus 2 years	Limitation Act 1980.
Tenders / quotes from suppliers (successful)	End of contract plus 7 years (or to the end of any warranty or service periods, if longer)	Limitation Act 1980
Tenders / bids for contracts made by Group / Entity (unsuccessful)	Last correspondence plus 2 years	Company Policy

C. Payroll

Type of Material	Minimum Retention Period	Reason
Pay records and relevant supporting documents	7 years from financial year end (statutory limitation period).	The time limit for a legal claim of under-payment or unlawful deductions
Material related to income tax and National Insurance	3 years after the end of the tax year they relate to	Statutory: Income Tax Regulations
Working time records	Date on which they were made plus 2 years	The Working Time Regulations 1998.
Records concerning pay due to employees during absence from work due to illness	End of the tax year to which they relate plus 3 years	The Statutory Sick Pay (General) Regulations 1982 as amended.
Records concerning parental leave / maternity pay or equivalent	End of the tax year in which the parental leave / maternity period ends plus 3 years	The Statutory Maternity Pay (General) Regulations 1986 as amended.
Minimum wage records	End of the pay reference period following the one that the records cover plus 3 years	National Minimum Wage Act 1998.

D. Marketing

Type of Material	Minimum Retention Period	Reason
Personal data used to contact existing subscribers (this may include email, telephone number, postal address) or select marketing audiences from the existing customers (this may include demographic information, marketing preferences and permission, communication history, and variables derived from the individual's transactional))	24 months from last interaction with (depending on context). Will be removed immediately when unsubscribed	Company Policy
Personal data used to contact prospective subscribers based on consent (this may include email and telephone number) or select audiences from prospective customers for marketing through electronic channels (this may include demographic information, marketing preferences, and communication history)	If the contact took place, 3 months from the contact date; if the contact did not take place, 6 months after initial collection. Will be removed immediately when unsubscribed	Company Policy
Personal data used to carry out suppression requests (this may include email, telephone number, and postal address)	Until the suppression is completed, the contact details are reduced to a minimum to prevent inadvertently contacting the individual again.	Company Policy
Anonymised data used for analytical or statistical purposes	Indefinitely (but review every 5 years to make sure retention remains useful, even if anonymised data is out of scope of GDPR).	Company Policy

Media coverage – records held consisting of news stories placed or press coverage received.	5 years to determine if the coverage is historically important; part of a crisis piece; or relates to an organisational priority that needs further retention.	Company Policy
Competition and prize draw records, including adverts, rules and, if applicable, official answers to questions set	Date of last event of a competition (close of the competition, winner selection, expiry for a winner to claim/select prize) plus 2 years.	Company Policy

E. Subscriptions

Type of Material	Minimum Retention Period	Reason
Active customer record – record including but not limited to name, date of birth, address, consent and communication preferences, transactions, direct debit, general correspondence and communication history	The lifetime of active interaction with organisation. The interaction may, for example, include donating, taking part in an event or making a complaint.	Company Policy
Inactive customer record – a record of an individual who has had no active interaction with the organisation	7 years from the last interaction	Company Policy
Suppressed record – record of an individual who has exercised their right to object to receiving future communication and for whom no other purpose for holding information is identified.	Indefinitely – reviewed every 5 years to make sure suppression and retention remains relevant.	Company Policy

Analytics customer record – customer excluding all personal information (may choose to retain CRM ID and postcode district) which is required to be used for statistical or analytical purposes.	Indefinitely, subject to review every 5 years to make sure retention remains useful.	Company Policy
Direct debit mandate	6 years after the end of the year or accounting period that includes the last Direct Debit	As proof of Direct Debit Instruction (DDI) and to assist in claims against that DDI
Images, photography, film, case studies and related consent forms linked to the said media coverage for use in marketing materials and campaigns	3 years from consent expiry for use in marketing materials. 50 years for historical importance.	Company Policy
Media coverage – records held consisting of news stories placed or press coverage received.	Reviewed after 5 years to determine if the coverage is historically important; part of a crisis piece; or relates to an organisational priority that needs keeping for longer	Company Policy

F. Miscellaneous Internal Processes

Type of Material Miscellaneous	Minimum Retention Period	Reason
Confidentiality and non-competition agreements (if a penalty is attached to the non-competition or confidentiality clause)	Minimum for the length of contract or agreement, but 6 years after contract expires.	Section 5 Limitation Act 1980
Intellectual property records	The recommendation is to retain documents for the life of the intellectual property and 6 years after	Section 5 Limitation Act 1980
Complaints Process	6 years from the final recorded communication from the complainant about the complaint.	Required as part of the Limitation Act 1980
Whistleblowing Process	6 years from the final recorded communication from the person raising the issue about the case. Where a case is raised anonymously, 6 years from the date the case is concluded.	Required as part of the Limitation Act 1980
Data Protection Impact Assessments	6 years	Company Policy
WhatsApp/buddy groups internal messaging	Chat data is cleared every 90 days	Company Policy

Breach Reporting	3 years after the investigation and remedial action were completed.	Company Policy
DSARs Request	1 year after the DSAR is complete.	Company Policy
Finance Internal emails	Financial Year + 3 Months	Company Policy
Staff Mailboxes and Outlook(inbound and outbound emails)	5 years	Company Policy