**DATA RETENTION POLICY**

Personal data relating to a living individual should be retained for no longer than reasonably necessary. However, we are obliged to retain certain records (whether in hard copy or electronic form) for various periods either because we have a statutory obligation to do so or because the information contained in those documents may be necessary in the future (for instance data that may be relevant to a possible legal claim needs to be kept until the period within which that claim could be brought has expired).

The table below lists the various periods of time applicable to different categories of records.

If a request is made by an individual for His or her data to be removed and this affects a document listed below that request should be referred to the **Data Protection Officer** as a matter of urgency so that an appropriate response can be made and the necessary action taken.

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| **Data** | **Retention Period** | **Statutory Duty to Retain or Recommendation?** | **Comments** |
|  |  |  |  |
| **Personnel** |  |  |  |
| Job applications and interview records of unsuccessful candidates | For unsuccessful candidates, 6 months from post being filled unless candidate consents to longer period | Recommendation |  |
| Contracts of employment | 7 years after employment ends | Recommendation |  |
| Qualifications/references | 7 years after employment ends | Recommendation |  |
| Disciplinary and grievance records | 7 years after employment ends | Recommendation |  |
| Resignation or termination of employment records | 7 years after employment ends | Recommendation |  |
| Personnel and training records (except Medical Staff records) | 6 years after employment ends | Recommendation |  |
| Personnel and training records (Medical Staff) | Perpetuity | Recommendation |  |
| Immigration checks | 3 years after employment ends | Recommendation |  |
| Employee Bank Details | As soon after employment ends once final payments have been made | Recommendation |  |
| Collective Agreements | 7 years from after agreement ends | Recommendation |  |
| Payroll and wage records | 7 years from end of financial year | Recommendation | **Statutory period is 6 years** |
| PAYE records | 7 years from end income tax year to which the records relate | Recommendation | **Statutory period is 3 years** |
| Out of hours records | 3 years | Recommendation |  |
| Timesheets records | 3 years | Recommendation |  |
| Diaries | 3 years | Recommendation |  |
| Expenses (travel and subsistence) | 7 years | Recommendation | Needed as supporting evidence re benefit in kind |
| Records of Benefits in Kind | 7 years | Recommendation |  |
| P45, P60, etc. | 12 years | Recommendation | **Statutory period is 6 years** |
| Annual return of taxable pay and tax paid | 12 years | Recommendation | **Statutory period is 6 years** |
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| **COMPANY DOCUMENTS** |  |  |  |
| **Incorporation and Constitution** |  |  |  |
| Certificate of Incorporation and Certificates on Change of Name | In perpetuity | **Statutory** |  |
| Memorandum and Articles of Association (original and updated copies) | In perpetuity | **Statutory** |  |
| Printed copies of resolutions submitted to Companies House | In perpetuity |  |  |
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| **Statutory Registers** |  |  |  |
| Register of Directors and Secretaries, Register of Directors’ interests in Shares and Debentures, Register of interests in voting shares, Register of Charges, Register of Documents sealed (if applicable)Register of Members,Register of Debentures and Loan Stock holders | In perpetuity | **Statutory** |  |
| **Shareholders and Debenture holders** |  |  |  |
| Applications for Shares, Debentures, etc | 12 years from issue | Recommendation |  |
| Renounceable Letter of Allotment and Acceptances | 12 years from renunciation | Recommendation |  |
| Renounced Share Certificates | 12 years from renunciation | Recommendation |  |
| Return of Allotments (copy) | Perpetuity |  |  |
| Contracts for purchase of own shares by Company | 12 years from date of contract. | Recommendation |  |
| Share & Stock Transfer forms | Perpetuity | Recommendation |  |
| Notification of address change by member | 1 years after notification | Recommendation |  |
| Annual Return (copy) | Perpetuity | Recommendation |  |
| Return of Allotments (copy) | Perpetuity | Recommendation |  |
| Cancelled share/stock Certificate  | Perpetuity | Recommendation |  |
| Letters of indemnity for lost Certificates  | Perpetuity | Recommendation |  |
| Stop Notice and other Court Orders  | Perpetuity | Recommendation |  |
| Powers of Attorney re shares, etc. | Perpetuity | Recommendation |  |
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| **Dividends** |  |  |  |
| Dividend and interest mandate forms | 3 years from when the instructionceased to be valid | Recommendation |  |
| Unpaid dividend records | 12 years after dividend declared | Recommendation |  |
| Dividend and interest payment lists | Until audit of the dividend payment has been complete | Recommendation |  |
| Paid dividend and interest warrants | 6 years after date of payment | Recommendation |  |
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| **Directors** |  |  |  |
| Directors’ Service Contracts | 6 years after cease to hold office |  |  |
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| **Accounting records detailing company transactions, including supporting documents, required by Companies Act** | 12 years | Recommendation (but see comment) | **Statutory period** **is 3 years for a private company, 6 years for a PLC**. |
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| **Records of Decision Making** |  |  |  |
| Board minutes | Perpetuity | Statutory |  |
| Shareholder Resolutions | Perpetuity | Statutory |  |
| Minutes of Shareholders Meetings | Perpetuity | Recommendation (but see comment) | **Statutory Period** 10 years. |
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| **BANK RECORDS** |  |  |  |
| Cheques, bills of exchange and other negotiable instruments | 6 years | Recommendation |  |
| Paying-in counterfoils | 6 years | Recommendation |  |
| Statements from and instructions to the bank | 6 years after ceasing to have effect | Recommendation |  |
| Signed annual report and accounts  | Perpetuity | Recommendation |  |
| Annual report and accounts (unsigned)  | Perpetuity | Recommendation | Keep sufficient copies to meet future requests |
| Interim report and accounts | Perpetuity | Recommendation | Keep sufficient copies to meet future requests |
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| **PENSION SCHEME (UNAPPROVED)** |  |  |  |
| Trust deeds and scheme rules | Perpetuity | Recommendation |  |
| Trustees’ minute books | Perpetuity | Recommendation |  |
| Records of individual pensioners | 12 years after cessation of benefit | Recommendation |  |
| Money purchase details | 6 years after transfer or value taken | Recommendation |  |
| Pension scheme investment policies | 12 years after cessation of benefit payable | Recommendation |  |
|  |  |  |  |
| **PENSION SCHEME (HMRC APPROVED AND STATUTORY PENSION SCHEMES)** |  |  |  |
| Pension fund accounts and supporting documents | Perpetuity | **Statutory** |  |
| Actuarial valuation reports 6 years | Perpetuity | Recommendation (but see comment) | **Statutory Period 6 years from date report signed** |
| Medical records - Radiation dosage | Perpetuity | Recommendation (but see comment) | **Statutory Period 2 years from end of calendar year** |
| Control of Lead at Work Regulations | Perpetuity | Recommendation (but see comment) | **Statutory Period 2 years from date of last entry** |
| Control of Asbestos a Work Regulations | Perpetuity | Recommendation (but see comment) | **Statutory Period 40 years** |
| COSHH Regulations | Perpetuity | Recommendation (but see comment) | **Statutory Period 40 years** |
|  |  |  |  |
| **TAX RECORDS** | Perpetuity | Recommendation | **Statutory period is 6 years from end of relevant period, but HMRC may be able to go back further in certain circumstances** |
| **LAND AND BUILDINGS** |  |  |  |
| Title Deeds | Until property sold or transferred | Recommendation |  |
| Leases | Until 6 years after expiry | Recommendation |  |
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| **INTELLECTUAL PROPERTY** |  |  |  |
| Evidence of creation of literary, dramatic or musical works | 70 years from death of creator | Recommendation | Based on relevant period of copyright protection |
| Evidence of artistic works, recordings, broadcasts, films, photographs | 70 years | Recommendation |  |
| Trademark registration certificates | Until 6 years after expiry. | Recommendation |  |
| Patent registration certificates | Until 6 years after expiry | Recommendation |  |
| Assignments of trademarks or patents | Until 6 years after expiry | Recommendation |  |
| Intellectual property licences or agreements | Until 6 years after expiry | Recommendation |  |