



Retention Policy

1. Introduction

- 1.1. The main aim of this policy is to enable us to manage our records effectively and in compliance with data protection and other regulation. As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.
- 1.2. We are committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.
- 1.3. The table below sets out the main categories of information that we hold, the length of time that we intend to hold them, and the reason for this.
- 1.4. Please note that the Appendix sets out the legal requirements for certain categories of document. Where we have decided to keep information longer than the statutory requirement, this has been explained in the table at Section 2.
- 1.5. Section 3 of this policy sets out the destruction procedure for documents at the end of their retention period. Human Resources shall be responsible for ensuring that this is carried out appropriately, and any questions regarding this policy should be referred to them.
- 1.6. If a document or information is reaching the end of its stated retention period, but you are of the view that it should be kept longer, please refer to Human Resources, who will make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.

Document Retention Period

Document type	Legislation/reasons for retention	Requirement
Corporate/constitutional records		
Company Articles of Association, Rules/bylaws	Companies Act 2006	Permanent
Director minutes of meetings and written resolutions, Dividend certificates	Companies Act 2006	Recommended at least ten years

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Shareholders' meetings etc. Minutes/resolutions	Companies Act 2006	Recommended at least ten years
Documents of clear historical/archival significance	General Data Protection Regulation (GDPR)	Permanent if relevant GDPR provisions are met
Contracts e.g. service, agreements, confidentiality and non-disclosure agreements	Limitation Act 1980	Length of contract term plus six years
Contracts executed as deeds	Limitation Act 1980	Length of contract term plus twelve years
Intellectual property records and legal files re provision of service	Limitation Act 1980	Recommended: Life of service provision or IP plus six years
Tax and Finance		
Annual accounts and review (including transferred records on amalgamation)	Companies Act 2006	Minimum six years Recommended: permanent record
Tax and accounting records	Finance Act 1998 Taxes Management Act 1970	Six years from end of relevant tax year
Information relevant for VAT purposes	Finance Act 1998 and HMRC Notice 700/21	Minimum six years from end of relevant period
Banking records/receipts book/sales ledger/purchase ledger	Companies Act 2006	Six years from transaction
Employee/Administration		
Payroll/Employee/Income Tax and NI records: P45; P6; P11D; P60 etc	Taxes Management Act 1970 /IT (PAYE) Regulations	Six years from end of current year
Maternity pay	Statutory Maternity Pay Regulations	Three years after the end of the tax year

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Sick pay	Statutory Sick Pay (General) Regulations	Three years after the end of the tax year
National Minimum wage records	National Minimum Wage Act	Three years after the end of the tax year
Foreign national ID documents	Immigration (Restrictions on Employment) Order 2007	Minimum two years from end of employment
HR files and training records	Limitation Act 1970 and Data Protection regulation	Maximum six years from end of employment
Records re working time	Working Time Regulations 1998 as amended	Two years
Job applications (CVs and related materials re unsuccessful applicants)	ICO Employment Practices Code	Twelve months from your notification of outcome of application
Insurance		
Employer's Liability Insurance	Employers' Liability (Compulsory Insurance Regulation) 1998	Forty years
Group Life Assurance	Commercial	Three years after lapse
Policies	Commercial	Three years after lapse
Claims correspondence	Commercial	Three years after settlement
Health & Safety/Medical		
General records	Limitation Act 1970	Minimum three years
Records re work with hazardous substances	Control of Hazardous Substances to Health Regulations 2002	Up to forty years. Recommended: permanent
Accident books/records and reports	Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995	Three years after last entry or end of investigation

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Medical Scheme documentation		Permanent unless personal data is included
Premises/Property		
Original title deeds		Permanent/to disposal of property
Leases	Limitation Act 1980	Twelve years after lease has expired
Building records, plans, consents and certification and warranties etc	Limitation Act 1980	Six years after disposal or permanent if of historical/archival interest. Carry out review re longer retention e.g. if possible actions against contractors
Pension Records	For all categories see:	
Records about employees and workers	Detailed Guidance for Employers: (April 2017) http://www.thepensionsregulator.gov.uk	
Records re the Scheme		
Records re active members and opt in/opt out		
Trust Deed/Rules and HMRC approvals		
Trustees' Minutes and annual accounts		
Policies including investment policies		
Client Related Documents		
Documentation & emails related to work completed on the behalf of client	For future reference	Company policy is 2-years



2. DELETION OF DOCUMENTS

- 2.1. When a document is at the end of its retention period, it should be dealt with in accordance with this policy.

Confidential waste

- 2.2. This should be made available for collection in the confidential waste bins located around the office and will be shredded by external supplier.
- 2.3. Anything that contains personal information should be treated as confidential.
- 2.4. Where deleting electronically, please refer to Human Resources to ensure that this is carried out effectively.

Other documentation

- 2.5. Other documentation can be deleted or placed in recycling bins where appropriate.

Automatic deletion

- 2.6. Certain information will be automatically archived by the computer systems, details of which are set out below. Should you want to retrieve any information, or prevent this happening in a particular circumstance, please contact Human Resources.

Individual responsibility

- 2.7. Much of the retention and deletion of documents will be automatic, but when faced with a decision about an individual document, you should ask yourself the following:
 - 2.7.1. Has the information come to the end of its useful life?
 - 2.7.2. Is there a legal requirement to keep this information or document for a set period? (Refer to document retention periods for more information)
 - 2.7.3. Would the information be likely to be needed in the case of any legal proceedings? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)
 - 2.7.4. Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?
 - 2.7.5. Is the document of historic or statistical significance?
- 2.8. If the decision is made to keep the document, this should be referred to Human Resources and reasons given.