

Document Retention Policy



1. Scope

All J Punton & Son Ltd records, whether analogue or digital, are subject to the retention requirements of this procedure.

2. Responsibilities

- 2.1 The following roles are responsible for retention of these records because they are the information asset owners.
- 2.2 Asset owners are responsible for ensuring that all personal data is collected, retained and destroyed in line with the requirements of the General Data Protection Regulation.
- 2.3 The Financial Officer (CFO) is responsible for retention of financial (accounting, tax) and related records.
- 2.4 The Head of Human Resources (HR) is responsible for retention of all HR records.
- 2.5 The Health & Safety Officer is responsible for retention of all Health and Safety records.
- 2.6 The Company Secretary is responsible for retention of all other statutory and regulatory records.
- 2.7 The Data Protection Officer is responsible for storage of data in line with this procedure.
- 2.8 The Manager is responsible for ensuring that retained records are included in business continuity and disaster recovery plans.

3. Procedure

- 3.1 The required retention periods, by record type, are recorded in the Retention Schedule under the following categories:
 - 3.1.1 Document/ Record produced
 - 3.1.2 Advised retention period
 - 3.1.3 Conditions/ Caveats
 - 3.1.4 Basis for decision
- 3.2 Each data asset that is stored is marked by the storing employee with the name of the record, the record type, the original owner of the data, the information classification, the method of storage, the required retention period, the planned date of destruction, and any other necessary information.
- 3.3 For all storage media (electronic and hard copy records), J Punton & Son Ltd retains the means to access that data.

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- 3.4 For all electronic storage media, J Punton & Son Ltd does not exceed the manufacturer's recommended storage life. This is recorded in the Document Retention Schedule. When the maximum of the manufacturer's recommended storage life is reached, the stored data is copied onto new storage media.
- 3.5 The business owner and the Asset Owner are responsible for destroying data once it has reached the end of the retention period as specified in Document Retention Schedule. Destruction must be completed within 30 days of the planned retention period. Destruction is handled in line with the specified procedures.
- 3.6 Portable/removable storage media are destroyed in line with specified procedures.

Document Owner and Approval

Mark Punton is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the General Data Protection Regulation.

A current version of this document is available to all members of staff on the company intranet and is published in the employee handbook.

This procedure was approved by the Mark Punton on 08.09.23 and is issued on a version controlled basis under his signature.

Signature:

Date:

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Mark Punton	08/09/23
2			
3			

Commented [LL1]: This should be whoever is named in the initial section or "asset owners"

Commented [LL2]: Where not applicable, detail where this document will be stored – this can be as a paper document or electronically.

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Appendix A: Document retention schedule

Document/ Record produced	Advised retention period	Conditions/ Caveats	Basis for decision

You may wish to consider the following guidance when deciding an appropriate retention period:

Company Records (including Share Registration)

Retention Period

Certificate of incorporation	Permanently
Certificate of commence business	Permanently
Certificate of company change of name	Permanently
Board minutes (signed copy)	Permanently
Written resolutions of board	Permanently
Minute books	Permanently
Board committee minutes (signed copy)	Permanently
Minutes of general & class meetings	Permanently
Written resolutions of members/ sole member	Permanently

Agreement and Other Related Correspondence

Retention Period

All contracts with: customers, suppliers, agents	10 years after expiry
Licensing agreements	10 years after expiry
Rental & hire-purchase	10 years after expiry
Indemnities & guarantees	10 years after expiry
Rental & hire-purchase	10 years after expiry
Indemnities & guarantees	10 years after expiry
Any other agreement or contract	10 years after expiry

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Deeds of title	Until sold or transferred
Leases	12yrs after termination & any terminal queries (e.g. Dilapidations) have been settled
Agreements with architects, builders	6yrs after completion
Patent and trade mark records	Life of company
Reports and opinions	10yrs after correspondence

Intellectual Property Records	Retention Period
Certificates of registration of trade/service marks	6yrs after cessation of registration
Intellectual property agreements & licences	6 or 12yrs after expiry

Pension Records	Retention Period
All trust deeds & rules	Permanently or, if merged with another fund, 12yrs after merging
Trustees' minute books	Permanently or, if merged with another fund, 12yrs after merging
Accounts & supporting documents	6yrs from date accounts signed
Inland Revenue approvals	Permanently or, if merged with another fund, 12yrs after merging
Actuarial valuation reports	Permanently or, if merged with another fund, 12yrs after merging
Records of pensioners	12yrs after benefit ceases
Records of ex-pensioners	Permanently or, if merged with another fund, 12yrs after merging
Pension quotes to members	1yr after audit, as long as final quote is equal to pension paid
Money purchase details	6yrs after transfer or value taken 12yrs after final cessation of any benefit payable under the policy
Pension scheme investment policies of benefit	12yrs after settlement of claim or final cessation
Individual life policies under 'top hat' schemes	12yrs after cessation of benefit
Group health policies	12yrs after cessation of benefit
Group personal accident policies	6yrs after yr. in which event occurred
Documents relating to events specified in RBS (IP) 1995, regs 6,8,10 & 11	6yrs from end of scheme yr. in which benefits began
Documents relating to decision to allow retirement due to incapacity	6yrs from end of scheme yr. in which event occurred
Documents relating to events specified in RBS (IP) 1995, regs 15(4)	6yrs from end of scheme yr. in which event occurred

Banking Records, including Giro	Retention Period
Cheques, bills of exchange & other negotiable instruments	6yrs
Paying-in counterfoils	6yrs
Bank statements & reconciliations	6yrs
Foreign exchange rates	15yrs

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Instructions to banks 6yrs after ceasing to be effective

Insurance Records

Retention Period

Public liability policies	Permanently
Product liability	Permanently
Employers' liability policies	Permanently
Insurance schedules	7yrs
Group Health policies	12yrs after cessation of benefit
Group personal accident policies	12yrs after cessation of benefit
Personal claims	7yrs from date of claim
Other policies	Until claims under policy are barred

Accounting and Tax Records

Retention Period

To comply with the companies Act 1985 (this includes all subsidiary records to support annual accounts)	PLC – 6yrs after audit, Ltd – 3yrs after audit
Budgets & Periodic internal financial reports e.g. to board (Master)	2yrs
Taxations returns and records	10yrs
VAT records	6yrs
Income Tax & NI returns, including correspondence with Tax Office	3yrs after end of FY to which records related
Income & expenditure	7yrs

Employee Records

Retention Period

Personal & training records (including disciplinary & grievance hearing notes)	6yrs after employment ceases; could be longer with agreement of individual
Appointment & staff appraisal records	5yrs
Redundancy records	12yrs from date of redundancy
Senior executive records	Permanently
Payrolls & wage records (including overtime, bonuses and expenses)	6yrs
Statutory Sick pay records & calculations	3yrs after end of FY to which records relate
Income Tax records (e.g. P45, P60, P58, P48)	6yrs
Annual return of taxable pay & tax paid	6yrs

Contractual and Trust Agreements

Retention Period

Contracts under seal	12yrs after expiry
Under contracts	6yrs after expiry
Trust Deeds	Permanently

Health and Safety Records

Retention Period

Record of consultations with safety representatives & committees	Permanently
Training records relating to safety at work	Permanently
Occupational Health records Under COSHH Regulations	During employment
Records of assessments, maintenance, air monitoring, medical surveillance &	40yrs
	2yrs from date of last entry

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biological tests
Classifications data under Chemicals
(Hazard Information & Packaging for
Supply) Regulations 1994 3yrs

Transport Records

Retention Period

Drivers log books	5 years after completion
Vehicle mileage records	2 years after vehicle disposed of unless liability claims
Vehicle maintenance records	2 years after vehicle disposed of unless liability claims
MOT records	2 years after vehicle disposed of unless liability claims
Registration records	2 years after vehicle disposed of unless liability claims

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Appendix B: Disposal considerations and guidance

Each of the following questions and related guidance should be considered prior to the disposal of any document.

- 1. Has the document been checked for type of document, recommended retention timescales in line with the schedules in this document and checked for confidentiality?**

Check that the nature and contents of the document are suitable for disposal

- 2. Is retention required to fulfil statutory obligations or other regulatory obligations?**

Specific legislation setting out mandatory retention periods for documentation held by **< FD NAME >** is limited but includes:

- The GDPR provides that data must be held for no longer than is necessary for the purposes for which the personal data is processed
- Standard contract law stands for 6 years following completion under the contact under the Limitations Act

Refer to the attached document retention schedules for relevant guidance

- 3. Is retention required for evidence?**

Is there an outstanding insurance claim, pending legal action or the likelihood of either?

- 4. Is there a current business requirement or Subject Access Request (SAR) that needs this information?**

- 5. Is retention required to meet any operational or business needs?**

- 6. How is the document to be disposed of?**

Ensure appropriate destruction certificates if applicable.

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Appendix C: Template certificate

TEMPLATE CERTIFICATE OF DESTRUCTION

THIS DOCUMENT GIVES A RECORD OF THE FOLLOWING ITEMS DUE FOR DESTRUCTION. PLEASE SIGN BELOW TO AUTHORISE AND SCAN A COPY OF THE CERTIFICATE TO THE RELEVANT STORAGE LOCATION

Department / division	Relevant authorising manager
Email	Telephone

RECORDS TO BE DESTROYED

Document type, name	Outwith retention period?	Authorisation received? Give relevant details.	Destruction date

Record destruction authorisation name and signature: _____

Date: _____

Records destroyed by _____

Date: _____