

Data Retention Policy

Policy Statement

This Company Policy and Procedure has been designed to help and encourage all employees to achieve and maintain expected standards of conduct. It applies to all employees and anyone else working for the Company, and its aim is to ensure consistent and fair practice and treatment.

This document does not form part of your Contractual Terms and Conditions of employment and the Company may at any time amend it without consultation or prior notice.

Purpose and Scope

Waterman Group (the Company) is committed to managing and handling personal data in line with best practice and data protection principles. As such this Policy details the procedures to use to ensure timely and secure disposal of documents and records that are no longer required for business purposes.

The Company holds a wide variety of personal data, from employees, workers, contractors, consultants, volunteers, interns and apprentices, as well as financial data, HR data, marketing data, client data and so on, many of which include personal data. This data is held in various formats including; letters, emails, contracts, forms, software systems in both hard copy and electronic form.

It is essential that this policy is adhered to, as premature destruction of documents could result in an inability to defend claims, business difficulties and failure to comply with data protection legislation, whilst appropriate destruction and disposal will ensure that the storage space is maximised and we are not keeping documents for an unnecessarily long period of time which would breach data protection legislation.

This policy applies to all of the information held by the Company and also any personal data that may be held by data processors (service providers) where they are processing information on the Company's behalf.

Everyone is responsible for ensuring that the records that they create/maintain are accurate, maintained and disposed of in accordance with this policy. It is recognised that the documentation created and maintained by the Company will change over time and therefore this policy should be viewed as a living document and it will be reviewed on an annual basis, or as necessary.

This policy should be read in conjunction with the [Data Protection Policy](#) and the [Data Breach Procedures](#).

Retention

Appendix 1 details the retention periods for specific types of documents and records.

Destruction/Disposal

Hard copies of confidential documents or personal data should be disposed of using the shredder or disposal via confidential waste bins. Under no circumstances should any personal or confidential



data be disposed of in any other manner, as this would potentially breach data protection legislation.

Disposal of documents which do not contain personal data or confidential information can be disposed of in any bin, by recycling or by electronic deletion in the case of electronic documents.

Appendix 1 – Data Retention Periods

Business Function	Examples of documents	Retention Period
HR	Personnel files, including offer letters, contracts of employment, contract addendums/appendices, contract amendments, documents relating to the employee's terms and conditions of employment with the Organisation and consultation on changes, salary reviews and rational, qualification certificates, training and working time records	Duration of your employment and for 7 years after the date of termination (howsoever arising)
	Business protection/confidentiality agreements	Duration of your employment and for 7 years after the date of termination (howsoever arising)
	CV / Application Forms / Interview Notes	12 months from date employment started (or application rejected)
	Driving Licence / MOT / Insurance Docs & DVLA Checks / Drivers Risk Assessment	12 months post-employment or renewed annually
	Starter Form	12 months post-employment
	Disciplinary / Grievance documentation (including expired warnings)	Documents created during investigation to be retained for 7 years during employment or 12 months post-employment. Outcome letter to be retained for duration of employment and 7 years post-employment
	Door access reports (for timekeeping purposes)	2 years after audit/date entry was made
	Right to work in the UK documentation	2 years post-employment
	Resident Labour Market Test documentation (for visa applications)	12 months post-employment
	References (obtained or provided)	7 years after date given or received
	Performance Reviews/Appraisal/Personal Progression/Development Plans	7 years post-employment
	Redundancy documentation	7 years from date of redundancy

Business Function	Examples of documents	Retention Period
	Display Screen Equipment (DSE) Assessment / General Health Risk Assessment	7 years post-employment
	Wage/salary records (including overtime, bonuses, expenses and National Minimum Wage (NMW))	7 years from end of the financial year in which payments were made
	Maternity/Paternity/Shared Parental Leave and pay records	7 years post-employment
	Parental Leave	7 years after the child reaches the age of 18
	Insurances (Private Medical, Life Assurance, Permanent Health Insurance (PHI))	7 years post-employment
	Hire Purchase Agreements (Cycle to Work, Mobile Phones, Gym membership)	7 years after transfer or value taken
	Company Car Details	7 years after end of the financial year to which they relate
	Documents relating to any accident at work including but not limited to, accident records and reports, doctors/occupational health reports or records, GP Fit notes, sick pay or insurance records (save where relevant and necessary)	10 years from the date of the accident
	Annual leave/Sick leave and pay records	7 years post-employment
	Pension / Auto-enrolment records	12 years after benefit ceases
	Income tax and NI returns, income tax records and correspondence with HMRC	Minimum 7 years after end of the financial year to which they relate
	Attachment to earnings	Minimum 7 years after end of the financial year to which they relate
	Exposure to asbestos	40 years from date of last entry
	Records relating to children and young adults (work experience/summer placements/dependent information)	Until child/young person reaches the age of 21 or a minimum of 7 years whichever is the longer

Business Function	Examples of documents	Retention Period
WA (HR)	Secondment Confirmation Forms	7 years post-employment
	Letter of instruction	No less than 7 years after the end of the financial year to which they relate
	IR35 Forms/ Audit	No less than 7 years after the end of the financial year to which they relate

***NOTE:**

Basic details, such as, ResID, Name, Dates of Employment, Company, Job Title, Employment Type will be retained indefinitely (to enable the provision of reference requests/employment checks)