Review Date : February 2024 unless significant Changes occur.

# Document Retention and Records Management Policy

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| --- | --- | --- | --- | --- | --- |
| Version | Date | Amended By | Summary of Change | File Location | Approved by/ Date |
| 0.1 | 02/04/2013 | Suzette Smith/ Stav Papageorgaki | Initial Draft |

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|  \\so-srv-files\ISO Standards\! Public\ISO27001 Policies  |

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| 1.0 | 05/04/2013 | Stav Papageorgaki | Minor changes and approved |  | DCISO/05/04/2013 |
| 1.0 | 14/02/2014 | ISM | Reviewed: No changes |  |  |
| 1.0 | 13-02-2015 | ISM | Reviewed: No changes needed |  |  |
| 1.0 | 10-02-2016 | ISM | Reviewed: No changes needed |  |  |
| 1.1 | 15-12-2016 | ISM | Logo Update and formatting |  |  |
| 1.1 | 19-12-2017 | ISM | Reviewed: No changes needed |  |  |
| 1.2 | 01/09/2018 | ISM | CCTV retention policy | SharePoint |  |
| 1.2 |  18/12/2018 | ISM | Reviewed: No changes needed | SharePoint |  |
| 2.1 | 15/02/2019 | ISM | Door Access Logs Added | SharePoint |  |
| 2.2 | 15/04/ 2019 | ISM | Changed the Data Protection Act from 1998 to 2018, added referral information | SharePoint |  |
| 3.0 | 3/03/2020 | ISM | Included “legal” in the reason section for the case files  | SharePoint  |  |
| 3.1 | 07/04/2021 | ISM | Reviewed. No changes added | SharePoint |  |
| 3.2 | 05/01/2022 | ISM | Reviewed. No changes added | SharePoint |  |
| 4.0 | 17/02/2022 | ISM | Added “Teams Calls” to section 5.8 | SharePoint |  |
| 4.15.0 | 21/09/202217/03/2023 | Legal CounselISM | Added Litigation Hold provision to Section 3Updated the “Introduction” section. Amended 5.8 | SharePointSharePoint |  |
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**References**

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| --- | --- |
|  | ISO 27001, Data Protection Act 2018 |
| Related Policies | Information Classification and Handling Policy, Documentation and Document Control Procedure |

**Glossary and Definitions**

|  |  |
| --- | --- |
| Term | Meaning |
| Microlink, MLPC | Microlink PC (UK) Ltd |

**Document Owner**

Information Security Manager

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# Introduction

The Board of Microlink recognises the fundamental importance of data protection. The Board, and staff are working together to ensure that, everyone at Microlink complies with the requirements of the relevant data protection legislation.

In accordance with the core values of the organisation our policy for data retention will observe the principles of ethics, legality, prudence, equality, safety, timeliness, fairness, transparency and simplicity.

Microlink PC (UK) Ltd recognises that records are an important part of its business and a key resource to effective operation and accountability. Like any asset, they require careful management and this policy sets out MLPC’s responsibilities in regards to document management.

The effective management of records, in all formats, depends as much on their efficient disposal as well as their long-term preservation. Records disposal policies are essential for effective records management.

These guidelines are also important in the context of Data Protection Act compliance.

# Scope

The policy has been issued to support staff in the areas of record management, record retention and compliance with the Data Protection Act.

This policy intends to cover all records and information from creation through to either destruction or retention for historical purposes.

Copies of alternative media (e.g. servers, microfilm or paper) should be destroyed in accordance with these guidelines. This is to ensure compliance with Data Protection and legislative requirements.

# Objectives of the Retention Guidelines

* Assist in identifying records that may be worth preserving permanently.
* Prevent premature destruction of records that need to be retained for a specified period to satisfy legal and financial obligations.
* Provide consistency.
* Improve records management practices within MLPC.

## 3.1 Legal Obligations

The following Acts are taken under consideration but are in no way an exhaustive list of the requirements this policy may fulfil.

Data Protection Act 2018

Freedom of Information Act (FOIA) 2005

Companies Act (Audit, Investigations and Community Enterprise) 2004

ISO 27001 Information Security Management System

## 3.2 Litigation Hold

Before records are finally destroyed appropriate enquiries should be made of Legal Counsel to ensure that there is no known risk of proceedings actual or pending that would necessitate retention of such records.

Legal Counsel may at any time for reasons related to a known or perceived risk of proceedings actual or pending or prospective instruct any records to be marked as NOT TO BE DESTROYED.

# Transfer of Records to Archive

Records which are subsequently identified as permanent should be marked “archive”.

Some information does not need to be kept at all – the following can be considered unimportant records of information and freely destroyed:

* “With Compliments” slips
* Catalogues and Trade Journals
* Telephone Message Slips
* Non Acceptance of Invitations
* Out of date distribution lists

Duplicated and superseded materials such as stationery, manuals, drafts, forms, address books and reference copies of annual reports may also be destroyed as unimportant.

Hard copy of documents where an electronic copy has been filed and saved in the secure Microlink servers can be included as unimportant documents and securely shredded.

# Retention Guide – Classification Scheme

Please see below tables classifying each type of document, according to the area of business and functionality.

## 5.1 Corporate Management and Administration

|  |  |  |
| --- | --- | --- |
| **Category** | **Retention Period** | **Reason** |
| Archived emails | 4 years | Common Practice |
| Case Files  | 6 years | Common Practise/legal |
| Complaints | 6 years after conclusion | Common Practice |
| Corrective Action Records | 6 years | Review Purposes |
| Information Management | Permanent | Common Practice |
| Internal and External Audits | 6 years | Review Purposes |
| Management of enquiries which result in significant changes to policy or procedure. | 6 years after use. | Common Practice |
| Management Reviews | 6 years | Audit |
| Minutes | Permanent. | Common Practice |
| Old Procedures and Revisions | 6 years | Review Purposes |
| Policies | Until superseded | Common Practice |
| Statutory Returns | Destroy 7 years from closure | Common Practice |
| Successful tender documents | Paper Copy – Destroy 6 years after the terms of contract have expired.Retain electronic copies for 12 years. | Statutory |
| Unsuccessful tender documents | Destroy 2 years after the terms of contract have expired. | Common Practice |
| Visitor Books | Permanent | Common Practice |

## 5.2 Finance

| **Category** | **Retention Period** | **Reason** |
| --- | --- | --- |
| Accounts | 6 years | Commercial |
| Annual Depreciation | 3 years | Audit |
| Annual Earnings Summary | Current plus 12 years | Legal |
| Bank Paying-In Counterfoils | 6 years | Legal/Tax |
| Bank Reconciliations | 6 years | Legal |
| Bank/GIRO Account Statements | 6 years | Legal |
| Banking Returns | 6 years | Legal |
| Cash Book | 10 years | Legal |
| Cash/Cheques Received Sheets | Current plus 6 years | Legal |
| Cheque/Remittance Advices | 6 years | Legal |
| Cheques/Remittance Advice | 6 years | Legal |
| Clock Cards | 2 years | Audit |
| Consolidated Accounts | 12 years | Commercial |
| Cost Control Ledge Analysis | 6 years | Legal |
| Customs and Excise Returns | Current plus 6 years | Legal |
| Daily Cash Book | 6 years | Legal |
| Disposal of Assets | 12 years | Commercial |
| Employee Pay Receipts | 2 years |  |
| Income Tax Pay Details | Current plus 6 years | Legal/Tax |
| Invoices Capital | 6 years or life of asset if longer | Commercial |
| Invoices Revenue | 6 years | Legal |
| Ledger Sheet | 12 years | Legal |
| Main Cash Book | Permanent | Legal |
| National Insurance Contributions | Current plus 6 years | Commercial |
| Others | 6 years | Commercial |
| P45,P58, P48, P6, P60 | Current plus 6 years | Legal/Tax |
| Pay Advice | Current plus 1 year | Legal |
| Payroll | Current plus 6 years | Legal |
| Pension Contributions | Permanent | Commercial |
| Petty Cash Records | Current plus 6 years | Legal |
| Petty Cash Returns | 6 years | Commercial |
| Purchase Orders Capital | 3 years after expiry | Audit |
| Purchase Orders Revenue | 4 years | Audit |
| Quotations Capital | 12 years | Audit |
| Schedule of Deductions | Current plus 6 years | Audit |
| Unpresented Cheque Lists | 6 years | Legal |
| VAT deferments | Current plus 6 years | Legal |
| National Insurance | Current plus 6 years | Audit/Tax |
| Other Tax | Current plus 6 years | Legal/Tax |
| *SC60 etc* | Current plus 6 years | *Legal/Tax* |
| Timesheets etc | 3 years | Legal |
| Purchase of Capital Assets | 6 years + | Legal |

## 5.3 Health and Safety

|  |  |  |
| --- | --- | --- |
| **Category** | **Retention Period** | **Reason** |
| Accident Books | 3 years after last entry |  |
| Accident forms/reports | Permanent |  |
| Building installations | Retain last two certificates |  |
| COSHH Health Surveillance Records | 40 years from date of last incident | Legal |
| Fire Alarm/emergency lighting | Retain last two certificates |  |
| Fire precaution log book | 6 years after last entry |  |
| Food hygiene courses for business | CY and 3 years |  |
| H&S Policies | Until superseded |  |
| H&S records of training | Until termination of contract and 6 years. |  |
| Health Records  | 40 years from date of last entry | Legal |
| Health Screening Records | 40 years | Legal |
| Lift | For as long as equipment is operated. |  |
| Machine maintenance log books | Life of Equipment |  |
| Plant and equipment examinations and tests | Current + 6 years |  |
| Record of anything carried out to comply with COSHH | 5 years or 40 years for personal experience of identifiable individuals | Legal |
| Record of health and safety arrangements | Until arrangements are changed |  |
| Safe systems of work | Unit superseded |  |
| Statutory Inspections | CY & 10 years |  |
| Waste transfer notes | CY and 2 years |  |

## 5.4 Human Resources

| **Category** | **Retention Period** | **Reason** |
| --- | --- | --- |
| Accident Reports | Working life of employee | Legal |
| Amended Code Number Notice | 6 years | Legal |
| Company Executive Records | 12 years | Legal |
| Criminal Records Bureau (CRB) Disclosure | Destroy one week from receipt of disclosure | Section 124 of Police Act 1997Good Practice |
| Disciplinary and grievance investigations where proved | Kept on personnel file, destroyed 6 years after the termination of employment. | Common Practice |
| Expense Accounts  | 7 years | Legal/Tax |
| Financial Reward (may be relevant to Finance) | Destroy 7 years after action completed. | Common Practice  |
| Group Health/Personal Accident | 12 years after benefit ends | Legal |
| Investigations into Equal Employment Opportunities | Destroy 5 years after action is completed | Common Practice |
| Management Systems – for example systems employed to capture: Name, Date of Birth, Date of Appointment, Work History, Details, Position/ Designation, Titles and Dates held. | Permanent.Transfer documents to archive after administrative use is concluded. | Legal |
| Medical Records | 30 years after expiry | Legal |
| Occupational Health | Destroy 50 years after last action | Common PracticeH&S Legislation |
| Payment Changes | 6 years | Legal/Tax |
| Payroll Control | Current plus 6 years | Legal/Tax |
| Pension Details | 10 years after end of benefits | Legal |
| Performance Appraisal (including Probation and Performance Plans) | Retained permanently whilst member of staff is employed. Destroyed after termination of employment. | Common Practice |
| Personnel File | Archived after employment is terminated and destroy 6 years thereafter. | Good practice |
| Routine staff training processes (not occupational health and safety related) – to also include certificate if given to HR i.e. exam results. | Permanent. | Commercial |
| Salary Register | 6 years | Legal |
| Termination of Employment via resignation, voluntary redundancy, dismissal and retirement. | Destroy 6 years after termination of employment. | Common Practice |
| Trust Records | Permanent | Legal |
| Unfounded disciplinary and grievance investigations  | Destroy after the grievance has been unfounded. | Common Practice |
| Unsuccessful Job Applications | Destroy after 6 months | Commercial |

## 5.5 Insurance

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| **Category** | **Retention Period** | **Reason** |
| Claims | 3 years after settlement | Good Practice |
| Policies | 12 years after lapse | Legal |
| Public and Product Liability Policies | Permanent | Legal |
| Schedules/Disclosures | 12 years after lapse | Legal |

## 5.6 Legal

|  |  |  |
| --- | --- | --- |
| **Category** | **Retention Period** | **Reason** |
| Architect/Builder Agreements | 6 years from contract end | Legal |
| Leases | 12 years from lease end | Legal |
| Others | 6 years after expiry | Legal |
| Planning Permission | 2 years from interest end | Legal |
| Royalty Payments/Agreements | 1 year after expiry | Legal |
| Title Deeds and Property Documents | 12 years after interest ceased | Legal |
| Under seal | 12 years after expiry | Legal |
| **Trade Mark Papers** |  |  |
| “CE” Marking Details | 10 years from cessation of manufacture | Legal |
| All related documents | Permanent | Commercial |
| Expired Patents | 12 years | Legal |

## 5.7 Logistics

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| **Category** | **Retention Period** | **Reason** |
| Goods Received Register | 4 years | Audit |
| Inward Invoice Register | 6 years | Legal |
| Stock records/purchasing record cards. | Destroy 3 years after the date of last entry | Legal |

## 5.8 Sales Records

| **Category** | **Retention Period** | **Reason** |
| --- | --- | --- |
| Customer Complaints | 7 years | Legal |
| Customer Enquiries | 1 year if unsuccessful | Commercial |
| Customer Orders | 6/12 years after expiry | Commercial |
| Journal Vouchers | 3-6 years | Legal/Tax |
| Nominal and Private Ledgers | Permanent | Legal/Tax |
| Outstanding Account Schedule | 7 years | Legal |
| Overdue Account Letters | Until Paid | Commercial |
| Project Files | 7 years | Legal |
| Sales Invoices/Credit Notes | 7 years | Legal |
| Sales/Journal Entries | 12 years | Legal/Tax |
| Statements | 2 years | Audit |
| Telephone Calls | 6 months | Legal |
| Teams Calls | 7 years | Legal |
| Referral information (customer information, assessment reports and any personal information relating to WPA) | archiving at 7 years and destruction after 15 years. | Legal  |

## 5.9 Security

| **Category** | **Retention Period** | **Reason** |
| --- | --- | --- |
| CCTV | 30 days | Commercial  |
| Door Access Logs | 2 Years | Commercial |
|  |  |  |

## 6.0 Approvals

Read and approved by those dealing with Records Management and Destruction:

ISM/ DPO – overall ……………………………………

Finance Director – financial records ……………………………………

Head of IT – IT assets ……………………………………

Logistics Manager – non-IT assets ……………………………………

Head of System Development – CRM database ……………………………………