



## RETENTION OF DOCUMENTS POLICY

### 1.0 INTRODUCTION

- 1.1 We are required to retain specific documents or information to comply with a range of legislation, e.g. Companies Acts, Health & Safety at Work Act, etc. (see end of policy) or with regulations and guidance issued by statutory organisations such as HMRC.
- 1.2 This policy describes our arrangements for ensuring that we retain legal and other designated documents or information for the length of time required.
- 1.3 In this policy the terms 'documents' and 'information' include items which are 'personal' or 'sensitive' data as defined by current data protection legislation.

### 2.0 RETENTION OF DOCUMENTS

- 2.1 We will retain documents and information for at least the minimum statutory period required, or to comply with current good practice. In specific cases we may also retain documents for longer than the minimum required, e.g. for historical reasons, or where it is anticipated that a complicated matter may be raised again some time in the future.
- 2.2 Documents and information will, unless specified otherwise, be held electronically to minimise the use of paper and storage space.
- 2.3 The documents and information that we will retain and the retention period for each item are listed in Appendix 1. This list will be revised and updated whenever any relevant new legislation is passed or formal guidance is issued.
- 2.4 The Manager will ensure that:
  - the required archive files are set up – electronic or hard copy;
  - if there is no space available in the AEL office, hard copy documents that have to be retained are held in secure off-site storage;
  - where documents are to be held for a designated period only, at the end of that period electronic items are deleted from the system and hard copy items are destroyed by shredding (if destruction is carried out off-site by a commercial company, a 'certificate of destruction' will be provided by the contractor).

### 3.0 IMPLEMENTATION & REVIEW

- 3.1 The Manager will ensure that this policy is implemented, and that it is reviewed by the Board at least every three years, or earlier if new legislation or regulations affecting retention is implemented.

## **Relevant legislation & sources**

Companies Acts 1985 & 2006

Data Protection Act 2018 [incorporating the EU General Data Protection Regulations]

Health & Safety at Work etc. Act 1974 (and supporting Regulations)

Limitation Act 1980

Taxes Management Act 1970

Pensions Acts 1995 & 2004

Equality Act 2010

Police Act 1997 (Part V)

Employer's Liability Regulations

HMRC guidance

SMP/SSP and related Regulations

## RETENTION OF DOCUMENTS - SCHEDULE

ITEM	RETAIN FOR	FORMAT
<b>Governance</b>		
Memorandum & Articles of Association	Permanent	Electronic & paper
Annual returns to FSA	Permanent	Electronic (scanned if required)
Annual returns – working papers	3 years	Electronic
Register of Board Members	Permanent	Electronic
Board minutes	Permanent	Paper (for current & previous years) then electronic
Declarations of Interest/Register of Interests Register of Benefits or Payments to Board/Staff	Permanent	Electronic – [1 <sup>st</sup> year paper then scanned]
Register of Hospitality, Gifts & Entertainment	Permanent	Electronic (scanned)
Business Plan	5 years (from completion)	1 <sup>st</sup> year – paper, then electronic
Policies & procedures – current versions	Permanent	Paper and electronic
<b>Insurance</b>		
Policy documents – previous years	3 years after lapse	Electronic (scanned if required)
Annual insurance schedule	6 years	Electronic (scanned if required)
Employer’s Liability Insurance Certificate	40 years	Electronic
Indemnities and guarantees	6 years after expiry	Electronic
Claims correspondence	3 years after settlement	Electronic (scanned if required)
<b>Finance, Accounting &amp; Tax</b>		
Annual accounts & annual review – signed copy	Permanent	Paper
Financial records – including purchase & sales ledgers, cash, VAT, journals	6 years after year end	1 <sup>st</sup> year – hard copy, then scanned
Tax returns and records	10 years	1 <sup>st</sup> year – hard copy, then scanned
Budgets & internal finance reports	2 years	Electronic

ITEM	RETAIN FOR	FORMAT
Cheque books, pay-in books	6 years after last date	Hard copy
Bank statements	6 years after year end	1 <sup>st</sup> year – hard copy, then scanned
<b>Contracts and Agreements</b>		
Contracts for the supply of goods & services, incl. professional services, to AEL	6 years after contract end	1 <sup>st</sup> year – hard copy, then scanned
Licensing, rental and hire purchase agreements	6 years after expiry	1 <sup>st</sup> year – hard copy, then scanned
Indemnities and guarantees	6 years after expiry	1 <sup>st</sup> year – hard copy, then scanned
Documents relating to successful tenders for work undertaken by AEL for others	6 years after contract end	1 <sup>st</sup> year – hard copy, then scanned
<b>Employment</b>		
Former employees' personnel records, including copy contracts, sickness & training records, references to other employers etc.	6 years from termination	1 <sup>st</sup> year hard copy, then scanned
General statements of Terms & Conditions	6 years from date replaced	Electronic
Applications/Interviews: Unsuccessful applications, shortlists, interview notes	6 months after interview	Hard copy
Salary/wage details incl.: PAYE, NI, P45, P60, SSP, Mat. pay, expenses etc. – current staff	Duration of employment	Electronic
Salary/wage details incl.: PAYE, NI, P45, P60, SSP, Mat. pay, expenses etc. – former staff	6 years from termination	Electronic
Redundancy details, payments & refunds	12 years from termination	1 <sup>st</sup> year hard copy, then scanned
<b>Pension schemes</b>		
Actuarial valuations	Permanently	Electronic (scanned)
Pension fund contribution returns	Permanently	Electronic (scanned)
Annual reconciliations of fund contributions	Permanently	Electronic (scanned)
Money purchase details	6 years after transfer or value taken	1 <sup>st</sup> year hard copy, then scanned

ITEM	RETAIN FOR	FORMAT
Qualifying service details	6 years after transfer or value taken	1 <sup>st</sup> year hard copy, then scanned
Pensioner records	12 years after benefits cease	Electronic (scanned)
Records relating to retirement benefits	6 years after retirement	1 <sup>st</sup> year hard copy, then scanned
<b>Health &amp; Safety (H &amp; S)</b>		
Incident reports (including accidents)	40 years from incident date	Front page – hard copy, remainder electronic
H & S assessments, Risk Assessments	Permanently	Electronic (scanned)
Consultations, meetings etc. with safety reps.	Permanently	Electronic
Health & Safety statutory notices	6 years after compliance	Electronic (scanned)