



DATA RETENTION POLICY

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Introduction

Honeybuns recognises that in the running of our business, we collect and process personal data from a variety of sources. This personal information is collated in several different formats including letters, emails, business cards, legal documents, employment records, operations records, images and statements. The personal data is held in both hard copy and electronic form.

Aims of the policy

Honeybuns will ensure that personal data that we hold is kept secure and that it is held for no longer than is necessary for the purposes for which it is being processed. In addition, we will retain the minimum amount of information to fulfil our statutory obligations and the provision of goods or/and services - as required by the data protection legislation, including the General Data Protection Regulation (GDPR).

Retention

This retention policy (with its schedule - Appendix), is a tool used to assist us in making decisions on whether a particular document should be retained or disposed of. In addition, it takes account of the context within which the personal data is being processed and our business practices.

Decisions around retention and disposal should be taken in accordance with this policy.

Where a retention period of a specific document has expired, a review should always be carried out prior to the disposal of the document. This does not have to be time-consuming or complex. If a decision is reached to dispose of a document, careful consideration should be given to the method of disposal.

Responsibility

The Data Protection Officer is responsible for keeping this retention schedule up to date, to reflect changing business needs, new legislation, changing perceptions of risk management and new priorities for our business. They are also responsible for determining (in accordance with this Policy) whether to retain or dispose of specific documents.

The Data Protection Officer may delegate the operational aspect of this function to the HR Manager or another member of the Management Team.

You should inform the Data Protection Officer if in any doubt about minimum retention periods or if the retention of a document is necessary for a potential claim.

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Disposal

We must ensure that personal data is securely disposed of when it's no longer needed. This will reduce the risk that it will become inaccurate, out of date or irrelevant.

The method of disposal should be appropriate to the nature and sensitivity of the documents concerned and includes:

- Non-Confidential records: place in waste paper bin for disposal
- Confidential records: shred documents
- Deletion of Computer Records
- Transmission of records to an external body
- Cloud storage

The table in the Appendix contains the retention period that we have assigned to each type of record. This will be adhered to wherever possible, although it is recognised that there may be exceptional circumstances which require documents to be kept for either shorter or longer periods.

Any questions regarding this policy should be referred to the Data Protection Officer by emailing data@honeybuns.co.uk.



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Appendix - Record Retention Schedule

These retention guidelines are established by Honeybuns to ensure legal compliance. Employees handling information should give special consideration to the categories of documents listed in the schedule below, and must avoid retaining a record if there is no business reason for doing so.

Type of record	Retention period
Employment records:	
PAYE records	3 years from end of fiscal year
Maternity and paternity pay records	3 years from end of fiscal year
Medical and health records	30 years after employment ceases
Unsuccessful candidates	6 months after last action
Accident report forms	3 years after last action
Parental leave records	5 years from birth of child
Employment records: redundancy, equal opportunities; health & welfare records	6 years after last action
Employees that left the business: emergency contacts and bank account details	Delete immediately after making final salary payment
Pay & tax: pay deductions, tax forms, payroll, loans	6 years after last action
Records of formal disciplinary actions in employee file	6 years after last action
Records of formal grievances in employee file	6 years after last action
Records of monitoring of exposures to hazardous substances under COSHH	5 years after last exposure (general) 40 years for personal exposure of identifiable employee
Health records of employees under occupational health surveillance	40 years from last exposure or entry on the record
List of persons exposed to Hazard Group 3 microbiological agents (COSHH)	40 years from date of last entry
Other health and safety related documentation	5 years after last action
Commercial contracts:	
Contracts with suppliers	6 years after last action
Purchase orders and invoices	7 years after last action
Tax and Accounting Records:	
Tax returns	10 years from end of fiscal year
Accounting & financial management information	6 years from end of fiscal year
Operational records:	
Closed circuit television recordings	Destroy 3 months from the date recorded except where required as evidence



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Fire Risk Assessments	Retain until superseded
Policies/Procedures	7 years
Complaints	6 years from end of fiscal year
Website data	Indefinitely
Property plans and surveys	25 years
Insurance schedules	10 years after last action
Pat tests, fire hazard tests	6 years from last action
Register of members	Life of company
Memorandum of association	Life of company
Register of directors and secretaries	Life of company
Employer's liability insurance certificates	Life of company
Intellectual property records:	
Copyright material	50 years from expiry