Records retention schedule

1 Introduction

1.1 This Record retention schedule accompanies and is incorporated into Contechs' Records management policy. It sets out the time periods that different types of Business Records (as defined in the Records management policy) must be retained for business and legal purposes. You do need not read the entire retention schedule, but rather should focus on the types of records relevant to your role.

1.2 The retention periods in the schedule are based on business needs and legal requirements, including our obligation under data protection law not to keep personal data for longer than is necessary. Once a retention period has expired the data or record should be reviewed and destroyed if it is no longer needed.

1.3 If you maintain any types of records that are not listed in this schedule, and it is not clear from the existing record types in this schedule what retention period should apply, please contact the Commercial and Legal Manager for guidance.

1.4 Any deviations from the retention periods in this schedule must be approved in advance by the Commercial and Legal Manager.

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2 Corporate records

Record	Recommended retention period	Storage format	Reason
Certificate of incorporation	Indefinitely	Paper or electronic	Companies Act 2006, s 15 (CA 2006)
New certificate of incorporation to reflect change of company name	Indefinitely	Paper or electronic	CA 2006, s 80
Memorandum & articles of association (signed original)	Indefinitely	Paper or electronic	CA 2006, ss 8 and 18
Trading certificate	Indefinitely	Paper or electronic	CA 2006, s 761
Accounting records	Three years from the date on which the record was made (private companies) Six years from the date on which the record was made (public companies)	Paper or electronic	CA 2006, ss 386 and 388
Records of all proceedings at directors' meetings, including: —board minutes; —minute books; —written resolutions of the board; —register of sealed documents.	10 years from the date of the meeting	Paper or electronic	CA 2006, s 248
Minutes of all proceedings of general meetings	10 years from the date of the meeting	Paper or electronic	CA 2006, s 355

Record	Recommended retention period	Storage format	Reason
Copies of all members' resolutions passed outside general meetings	10 years from the date of the resolution	Paper or electronic	CA 2006, s 355
All decisions made by a sole member	10 years from the date of the decision	Paper or electronic	CA 2006, ss 355 and 357
Register of directors and their residential addresses	Indefinitely for the register itself	Paper or electronic	CA 2006, s 162
Directors' service contracts and any variations	Seven years from termination or expiry of the contract, unless executed as a deed, in which case 13 years from termination or expiry	Paper or electronic	Limitation Act 1980 ss 5, 8 CA 2006, ss 227 and 228
Register of secretaries	Indefinitely for the register itself	Paper or electronic	CA 2006, s 275
Register of disclosed interests	Indefinitely for the register itself An old entry may be removed from the register if more than six years have elapsed since the entry was made A third party may apply for an entry relating to them to be removed from the register, if it is incorrect	Paper or electronic	CA 2006, ss 793, 808, 816 and 817
Register of members	Indefinitely for the register itself Former members may be removed from the register after 10 years from the date their membership ceases	Paper or electronic	CA 2006, ss 113 and 121
Contracts for the purchase by a company of its own shares, or if the contract is not in	10 years from:	Paper or electronic	CA 2006, s 702

Record	Recommended retention period	Storage format	Reason
writing, a written memorandum setting out its terms	—the date on which the purchase of all the shares in pursuance of the contract is completed; or —the date on which the contract otherwise determines.		
Register of debenture or loan stockholders	Indefinitely for the register itself There is a 10 year limit on claims arising from the making or deletion or a failure to make or delete any entry in the register	Paper or electronic	CA 2006, s 748

3 Human Resources records

Record	Recommended retention period	Storage format	Reference
Rejected job applicant records, including: • contact details • application letters or forms • CVs • references • certificates of good conduct • interview notes • assessment and psychological test results	Six months after applicant is notified of rejection unless the applicants requests that their details are retained.	Paper or electronic	ICO Employment Practices Code para 1.7 Equality Act 2010, s 123
Application records of successful candidates, including: • application letters or forms • copies of academic and other training received • references • correspondence concerning	Six years after employment ceases	Paper or electronic	Limitation Act 1980 (LA 1980), s 5

Record	Recommended retention period	Storage format	Reference
employment • CVs • interview notes and evaluation forms • assessment and psychological test papers and results			
Criminal records information: • criminal records requirement assessments for a particular post • criminal records information forms • the Disclosure and Barring Service (DBS) check forms • DBS certificates	Criminal records requirement assessments for a particular post—12 months after the assessment was last used	Paper or electronic	DBS guidance for employers: Duration of criminal record check validity ICO Employment Practices Code Nov 2011, part 1.7.4
Employment contracts, including: • personnel and training records • written particulars of employment • changes to terms and conditions	Six years after employment ceases, unless document executed as a deed, in which case 12 years after employment ceases	Paper or electronic	LA 1980, ss 5, 8
Directors' service contracts and any variations	Six years from termination or expiry of the contract, unless executed as a deed, in which case 12 years from termination or expiry	Paper or electronic	LA 1980, ss 5, 8 Companies Act 2006, ss 227 and 228
Copies of identification documents (e.g. passports)	Not less than two years from date of termination of employment	Paper or electronic	Immigration (Restrictions on Employment) Order SI 2007/3290, Art 6(1)(b)
Identification documents of foreign nationals (including right to work)	Not less than two years from date of termination of employment	Paper or electronic	Immigration (Restrictions on Employment) Order SI 2007/3290, art 6(1)(b)
Records concerning a temporary worker	Six years after engagement ceases	Paper or electronic	LA 1980, s 5
Employee performance records, including: probationary period reviews review meeting and assessment interviews appraisals and evaluations promotions and demotions	Six years after employment ceases	Paper or electronic	LA 1980, s 5

Record	Recommended retention period	Storage format	Reference
Records relating to and/or showing compliance with Working Time Regulations 1998 including: registration of work and rest periods working time opt-out forms	Two years from the date on which the record was made	Paper or electronic	Working Time Regulations 1998, SI 1998/1833, reg 9
Redundancy records	Six years from date of redundancy	Paper or electronic	LA 1980, s 5
Annual leave records	Six years after the end of each tax year	Paper or electronic	LA 1980, s 5
Parental leave records	Six years after the end of each tax year	Paper or electronic	LA 1980, s 5
Sickness records	Six years after the end of each tax year	Paper or electronic	LA 1980, s 5
Records of return to work meetings following sickness, maternity etc	Six years the end of each tax year	Paper or electronic	LA 1980, s 5

4 Health and safety records

Record	Recommended retention period	Storage format	Reason
Records of reportable injuries, diseases or dangerous occurrences —reportable incidents; —reportable diagnoses; —injury arising out of accident at work (including Contechs' accident book).	Three years from date of the entry in the record	Paper or electronic	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR 2013), SI 2013/1471, reg 12
Health records as specified by the Control of Substances Hazardous to Health Regulations (COSHH)	40 years from the date of the last entry made in the record	Paper or electronic	The Control of Substances Hazardous to Health Regulations 2002 (COSHH 2002), SI 2002/2677, reg 11
Records of monitoring of exposures to hazardous substances (where exposure	Where the record is representative of the personal exposures of identifiable	Paper or electronic	COSHH 2002, SI 2002/2677, reg 10(5)

Record	Recommended retention period	Storage format	Reason
monitoring is required under COSHH)	employees—40 years from the date of the last entry made in the record Otherwise, five years from the date of the last entry made in the record		
Records of examinations and tests of engineering controls and respiratory protective equipment under COSHH	Five years from the date on which the record was made	Paper or electronic	COSHH 2002, SI 2002/2677, reg 9(4)

5 Security records

Record	Recommended retention period	Storage format	Reason
CCTV footage—standard	30 days from date of recording	Electronic	Evidential and security purposes.
CCTV footage—where investigation is ongoing	7 years from closure of the investigation	Electronic	Evidential purposes.
Building access records	3 months from date of the record	Paper or electronic	Evidential and security purposes.
IT security management Records which demonstrate IT systems used by Contechs are safe and secure.	*7 years* from date of the record	Paper/electronic	Evidential and business (predominantly information security)
IT security system update register	7 years from date of updated record	Electronic	Evidential and business (predominantly information security)
IT application records	7 years from the date when the application is no longer in use or the supporting records	Electronic	Evidential and business (predominantly

Record	Recommended retention period	Storage format	Reason
	are superseded.		information security)

6 Customer records

Record	Recommended retention period	Storage format	Reason
Customers' account details	*7 years* from end of relationship with customer, i.e. end of contractual relationship or date of last contact (whichever is later)	Electronic and paper	Evidential and business
Customer complaints	*7 years* from end of relationship with customer, i.e. end of contractual relationship or date of last contact (whichever is later)	Electronic and paper	Evidential and business
Details of accounts and products/services not taken up	5 years from end of relationship with customer	Electronic	Business
Customer debt management—internal and/or third party records	7 years from the date resolution, eg recovery or write-off.	Electronic/paper	Evidential and business
Customer feedback—employee performance	18 months from the date of the record	Electronic	Business
Reviews by customers	5 years from end of relationship with customer	Electronic	Business
Records of customers who have signed-up to receive non-marketing newsletters	Until customer unsubscribes	Electronic	Business

7 Marketing and business development records

Record	Recommended retention period	Storage format	Reason

Record	Recommended retention period	Storage format	Reason
CRM (customer relationship management) records—of former, current and potential customers	2 years from last active engagement with customer	Electronic	Legitimate business purposes
Sales Proposals to include any RFI relating to Client records.	[agree – 7 years from issue of]	Electronic	Legitimate business purpose
Direct marketing information relating to a current customer, i.e. a customer we have engaged with in the past 2 years	2 years from last active engagement	Electronic	Legitimate business purposes
Direct marketing information relating to a potential customer	2 years from data collection	Electronic	Legitimate business purposes
Information recorded on marketing suppression lists, i.e. individuals who have notified as they do not wish to receive marketing communications	Individual entries on the suppression list must be deleted 50 years from the date the marketing opt-out request was received	Electronic	Evidential and business purposes
Website cookie data for targeted advertising	12 months from the date the cookie or tracking code was created	Electronic	Evidential and business purposes

8 Recruitment and Contractor Care Activities

Record	Recommended retention period	Storage format	Reason
Job seeker personal information	6 months without consent 3 years from date consent given	Electronic	ICO Employment Practices Code para 1.7 Equality Act 2010, s 123
Application records	[how long does Vincere store this information]	Electronic	ICO Employment Practices Code para 1.7 Equality Act 2010, s 123

Criminal records information: • criminal records requirement assessments for a particular post • criminal records information forms • the Disclosure and Barring Service (DBS) check forms • DBS certificates	Criminal records requirement assessments for a particular post—12 months after the assessment was last used	Paper or electronic	DBS guidance for employers: Duration of criminal record check validity ICO Employment Practices Code Nov 2011, part 1.7.4
Employment contracts, including: • personal records • written particulars of employment • changes to terms and conditions	Six years after employment ceases, unless document executed as a deed, in which case 12 years after employment ceases	Paper or electronic	LA 1980, ss 5, 8
Contract for services and any additional signed agreements to include but not limited to Confidentiality Agreement or policy documents.	Six years after engagement ceases, unless document executed as a deed, in which case 12 years after employment ceases	Paper or electronic	LA 1980, ss 5, 8
Identification documents for workers.	Not less than 2 years from the date of termination of the Agreement.	Paper or electronic	LA 1980, ss 5, 8
Headcount records	Maximum of 7 years (anything kept longer will be anonymised)	Electronic	LA 1980, ss 5, 8
Offboarding data	Maximum of 7 years (anything kept longer will be anonymised)	Electronic	LA 1980, ss 5, 8

9 Project/Programme Management System

Record	**Recommended retention period**	**Storage format**	**Reason**
Candidate information	To completed	Electronic	Evidential and business purposes
Candidate timesheets	7 Years	Electronic	Evidential and business purposes
Proposals for projects won	7 years from completion of the work	Electronic	Evidential and business purposes

Record	Recommended retention period	Storage format	Reason
Proposals for projects which were not taken up	2 years	Electronic	Evidential and business purposes
Accounts and purchasing information	7 years from transaction	Electronic	Evidential and business purposes
KIPs and target tracking	2 years	Electronic	Evidential and business purposes
Client Data	7 years from last engagement or if no engagement for 2 years from last contact.	Electronic	Evidential and business purposes
Supplier data	7 years from last engagement or if no engagement for 2 years from last contact.	Electronic	Evidential and business purposes
Contracts and other legal documentation	12 years from termination of the agreement	Electronic	Evidential and business purposes
Placement information	7 years from the end of the engagement	Electronic	Evidential and business purposes

10 Data protection records

Record	Recommended retention period	Storage format	Reason
Registers	Registers are maintained indefinitely Individual entries on each register should be deleted 7 years after the relevant processing ceased or any ongoing matters relating to the entry are closed, whichever is the later Superseded registers should be deleted after 7 years	Electronic	Evidential and business purposes

Record	Recommended retention period	Storage format	Reason
Management of data subject requests	3 years from the date the request is completed (including regulatory appeals, investigations and court action), or last contact with data subject, whichever is later	Electronic/paper	Evidential and business purposes
Data protection complaints	7 years from end of relationship with customer (including any extension to the relation while dealing with the complaint)	Electronic/paper	Evidential and business purposes
Data breach notification	7 years from the date we became aware of the breach or regulatory/civil action is finalised, whichever is later.	Electronic/paper	Evidential and business purposes
Correspondence and consultation with regulators	7 years from the date correspondence, consultations etc are concluded.	Electronic/paper	Evidential and business purposes
Compliance records	7 years from the date the document is no longer active or has been superseded	Electronic/paper	Evidential and business purposes
Undertakings to regulators	7 years from the date the undertakings were given or discharged, whichever is later	Electronic/paper	Evidential and business purposes
DPO and privacy team, operational, oversight and assurance records	7 years from the date the document is no longer active or was superseded	Electronic/paper	Evidential and business purposes

11 Customer Technical, Design or Engineering data

Record	Recommended retention period	Storage format	Reason
Client Project Files Proposals, contracts, deliverables, meeting notes	Client Specific, Min 5 Years form end of Program	Electronic	Customer Specific
Engineering / Design Documents, Cad Files, Designs, Specifications, Simulation results.	Customer Specific or 10 Years End of Vehicle Build	Electronic	Road Vehicles (Approval) Regulations 2020
Prototype / R&D Data Prototype Build doc, Test results, regulatory certs.	Customer Specific or 10 Years End of Vehicle Build	Electronic	Road Vehicles (Approval) Regulations 2020
Automotive Compliance Data, Homologation evidence, safety tests, regulatory certs	Customer Specific or 10 Years End of Vehicle Build	Electronic	Road Vehicles (Approval) Regulations 2020

12 Other non-public records

Record	Recommended retention period	Storage format	Reason
Compliance and regulatory records	Registers are maintained indefinitely Individual entries on a register and other documents should be deleted 7 years after they cease to be relevant Superseded registers should be deleted after 7 years	Electronic and paper	Evidential and business purposes
Documents with no formal retention requirement	7 years from the date the record or document was created	Electronic/paper	Evidential and business purposes