



## **Data Retention Policy**

**Scope of the Policy** – All Parties (Employees, Volunteers and Apprentices, Clients, Suppliers etc).

Approved by:

Review Date: April 2026



## Introduction

Fresh Start Future Enterprises Ltd (hereinafter referred to as "the Company") is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection.

Our Data Protection Policy and Data Retention Policy refers to our commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store, dispose and handle data fairly, transparently and with respect towards individual rights.

Information is one of the Company's corporate assets; in the course of carrying out its' various functions, Fresh Start Future Enterprises Ltd accumulates information from both individuals and external organisations. Fresh Start Future Enterprises Ltd also generates a wide range of data, which is recorded in documents and records.

These documents and records are in several different formats, examples of which include, (but are not limited to) data such as names, emails, IP addresses; financial information; payroll for the purpose of processing employee contractual rights; legal documents such as contracts.

For the purposes of this Policy, the terms 'document' and 'records' include information in both hard copy and electronic form and refers to personal identifiable data within.

In certain circumstances it will be necessary to retain specific documents in order to fulfil statutory or regulatory requirements and also to meet operational needs. Document retention may also be useful to evidence events, review and re-engage support or agreements in the case of disputes, and also to preserve information which has historic value in order to support our client(s).

Premature destruction of documents could result in inability to defend litigious claims, operational difficulties, assist with Court proceedings and failure to comply with the GDPR.

Lengthy or indefinite retention of personal information could result in the Company breaching the GDPR.

It is important for the above reasons that Fresh Start Future Enterprises Ltd has in place systems for the timely and secure disposal of documents and records that are no longer required for business purposes and in accordance with the GDPR are kept up-to-date and relevant

The policy applies to all Company employees, volunteers and apprentices, as well as any individuals engaged in activities on behalf of the Company.



## **Policy Statement**

- 1.1 Fresh Start Future Enterprises Ltd will ensure that information is not kept longer than is necessary and will retain the minimum amount of information that it requires to carry out its' statutory functions and the provision of services.
- 1.2 The key objective of this Policy is to provide the Company with a simple framework which will govern decisions on whether a particular document should be retained or disposed of. In the case of documents which are to be retained by the Company, the Policy includes guidance on the format in which they should be retained and agreed retention periods.
- 1.3 Implementation of the Policy should ensure transparency when retrieving information, for the purposes of a subject access and reduce the amount of information that may be held unnecessarily.
- 1.4 The Policy clarifies the different roles of employees in relation to document retention and disposal in order that they understand their responsibilities, and who to refer to if they are unsure about any document and require clarification.

## **Retention and Disposal Policy**

- 2.1 Decisions relating to the retention and disposal of documentation should be taken in accordance with this Policy, in particular:-

Document Retention Schedules – Guidance on the recommended and statutory minimum retention periods for specific types of documents and records.

- 2.2 In circumstances where a retention period of a specific document has expired, a review should always be carried out prior to a decision being made to dispose of it. This review should not be particularly time consuming and should be straightforward. If the decision to dispose of a document is taken, then consideration should be given to the method of disposal to be used.

## **Responsibilities**

- 3.1 Senior Management - The COO (and other Directors) of Fresh Start Future Enterprises Ltd is responsible for determining (in accordance with this Policy) whether to retain or dispose of specific documents within the remit of their service area.

3.2 Directors may delegate the operational aspect of this function within the organisation.

- 3.3 Directors should seek advice from the CEO if they are uncertain as to whether minimum retention periods are prescribed by law, or whether the retention of a document is necessary to the Company's position where a potential claim has been identified, or for operational purposes.



3.4 Directors should ensure that the Schedule in Appendix 1 which is relevant to their service is kept up to date.

3.5 All employees of the Company have a responsibility to familiarise themselves with this Data Retention Policy and act in accordance with its principles.

## **Disposal**

4.1 Confidential waste which is located around the Fresh Start Future Enterprises Ltd should be disposed of using the shredder.

4.2 Disposal of documents other than those containing confidential or personal data may be disposed of by binning, recycling and deletion (in the case of electronic documents).

4.3 Records of disposal should be maintained and should detail the batch of documents disposed of, the date and the Director who authorised the document's disposal.

## **Conclusion**

Fresh Start Future Enterprises Ltd is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. Our Data Protection Policy and Data Retention Policy refers to our commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

Name: Cathryn Grint

Signed: **Cathryn Grint**

Date: 16<sup>th</sup> April 2025



## Disposal and Retention Considerations

Each of the following questions and guidance underneath them should be considered prior to the disposal of any document.

### **1. Has the document been appraised?**

- Check that the nature and contents of the document is suitable for disposal.

### **2. Is retention needed to fulfil statutory obligations or other regulatory obligations?**

- Specific legislation setting out mandatory retention periods for documentation held by Fresh Start Future Enterprises Ltd is very limited, but includes the following: -
  - i. Tax legislation – minimum retention periods for certain financial information are stipulated by the VAT Act 1994 and the Taxes Management Act 1970.
  - ii. HMRC legislation – minimum retention periods for employee processing payroll

### **3. Is retention needed for evidence?**

- Keep any documents which may be needed for legal proceedings until the threat of proceedings has passed.

### **4. Is retention needed to meet the operational needs of the service?**

- Consider whether the document in question may be useful for future reference, as a precedent or for performance management purpose.



## Document Retention Schedules

The following schedules provide guidance on the retention periods applicable to a wide range of Fresh Start Future Enterprises Ltd documents.

There is a Document Retention Schedule for each service. The headings in each Schedule are as follows:

**Reference Number** – This section provides ease of reference.

**Function Description** – The Schedule provides notes that define each function in terms of related activities.

**Retention Action** – This entry provides the guidance as to whether the document should be retained, and if so, how long for. It also provides guidance regarding the method by which documents should eventually be disposed of.

**Examples of Records** – This section provides common examples of the type of records included within the particular function. This list is not exhaustive.

**Notes** – This indicates if the retention action is common practice or statutory.



## Human Resources

| Reference Number | Data Type                                     | Function Description | Retention Period                        | Examples of Records | Notes |
|------------------|---|----------------------|---|---------------------|-------|
|                  | Personnel Files -                             |                      | 7 years after departure of staff member |                     |       |
|                  | Files and details of disciplinary Proceedings |                      | 7 years after departure of staff member |                     |       |
|                  | Recruitment                                   |                      | 7 years after recruitment               |                     |       |
|                  | Holiday and Sickness allowance                |                      | 7 years after departure of staff member |                     |       |
|                  | Passport/Right to work                        |                      | 7 years after departure of staff member |                     |       |
|                  | Photographs                                   |                      | 7 years after departure of staff member |                     |       |
|                  | Bank Details                                  |                      | Until Departure of member of staff      |                     |       |



## Finance

| <u>Reference Number</u> | <u>Data Type</u>    | <u>Function Description</u> | <u>Retention Period</u> | <u>Examples of Records</u> | <u>Notes</u> |
|-------------------------|---------------------|-----------------------------|-------------------------|----------------------------|--------------|
|                         | Internal Audit      |                             | 7 years                 |                            |              |
|                         | Payroll             |                             | 7 years                 |                            |              |
|                         | Management Accounts |                             | 7 years                 |                            |              |
|                         | Employee Expenses   |                             | 7 years                 |                            |              |
|                         | Bank Details        |                             | 7 years                 |                            |              |
|                         | Tax                 |                             | 7 years                 |                            |              |

## Volunteers

| <u>Reference Number</u> | <u>Data Type</u>  | <u>Function Description</u> | <u>Retention Period</u>          | <u>Examples of Records</u> | <u>Notes</u> |
|-------------------------|-------------------|-----------------------------|----------------------------------|----------------------------|--------------|
|                         | Personnel Files - |                             | 7 years from end of Volunteering |                            |              |
|                         |                   |                             |                                  |                            |              |
|                         |                   |                             |                                  |                            |              |
|                         |                   |                             |                                  |                            |              |
|                         |                   |                             |                                  |                            |              |



## Clients

| <u>Reference Number</u> | <u>Data Type</u>                                   | <u>Function Description</u> | <u>Retention Period</u>                 | <u>Examples of Records</u>       | <u>Notes</u>   |
|-------------------------|--|-----------------------------|---|----------------------------------|--|
|                         | Personal data and work specific documents and data | Service Delivery            | 10 years from date of last intervention | Personal Data, related documents | Beneficial for Legal Proceedings and those that have continuity of service with us, even with short gaps between services. |
|                         |  |                             |   |                                  |  |
|                         |  |                             |   |                                  |  |
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|                         |  |                             |   |                                  |  |