



Data Retention Policy for Engims

Policy Statement

This Company Policy and Procedure is designed to help and encourage all employees to achieve and maintain the expected standards of conduct. It applies to all employees, contractors, and any other individuals working for the Company. The aim is to ensure consistent and fair practice and treatment.

This document does not form part of the contractual terms and conditions of employment, and the Company may amend it at any time without consultation or prior notice.

Purpose and Scope

Engims is committed to managing and handling personal data in line with best practices and data protection principles. This Policy details the procedures to ensure the timely and secure disposal of documents and records that are no longer required for business purposes.

Engims holds a variety of personal data, including data from employees, clients, contractors, and consultants. This data is in various formats, including letters, emails, contracts, forms, and software systems, both in hard copy and electronic form.

It is essential to follow this policy to prevent premature destruction of documents, which could result in legal, business, or compliance issues. Proper data disposal maximizes storage space and helps avoid breaches of data protection regulations by ensuring that unnecessary data is not kept for too long.

This policy applies to all information held by Engims, including data processed by service providers on our behalf. All employees and contractors are responsible for ensuring that the records they create and maintain are accurate and disposed of in accordance with this policy.

Documentation requirements may evolve over time, so this policy should be viewed as a living document, subject to annual or as-needed reviews. It should be read alongside the **Data Protection Policy** and **Data Breach Procedures**.

Retention

Appendix 1 outlines the retention periods for different types of documents and records relevant to outsourcing business functions.

Destruction/Disposal

- **Hard Copies:** Confidential documents or personal data must be disposed of using shredders or designated confidential waste bins. Disposal of personal or confidential data through other methods could breach data protection legislation.
- **Non-Confidential Data:** Documents that do not contain personal or confidential data may be disposed of in any bin, recycled, or deleted electronically, as appropriate.

Appendix 1 – Data Retention Periods

Business Function	Examples of Documents	Retention Period
HR	Personnel files, contracts of employment, salary reviews, qualification certificates, training, working time records	Duration of employment and 7 years after termination
	CVs, Application Forms, Interview Notes	12 months from start of employment (or rejection)
	Driving License, Insurance Docs, Checks, Passport	12 months post-employment or renewed annually
	Starter Forms	12 months post-employment
	Disciplinary/Grievance Documentation (including expired warnings)	Investigation documents: 7 years during employment or 12 months post-employment. Outcome letter: 7 years post-employment
	Performance Reviews, Appraisals, Development Plans	7 years post-employment
	Annual Leave, Sick Leave and Pay Records	7 years post-employment
	Maternity/Paternity/Shared Parental Leave Records	7 years post-employment
	Pension/Auto-enrolment Records	12 years after benefit ceases
	Income Tax and Insurance Records,	Minimum 7 years post-financial year
	Accident/Incident Reports	10 years from the date of the accident
	Parental Leave	7 years after the child reaches 18 years of age

	Private Medical Insurance, Life Assurance, PHI	7 years post-employment
	Company Car Details	7 years post-financial year
	Basic Employee Details (Name, Dates, Job Title)	Retained indefinitely for reference checks

Client & Business Data (Relevant to UK Clients)

Business Function	Examples of Documents	Retention Period
Client Contracts	Service agreements, outsourcing contracts, SLAs	7 years after contract end date
Invoices and Payment Records	Financial statements, invoices, payment records	7 years post-financial year
Client Communications	Emails, records of meetings or negotiations	7 years post-communication
Project Documentation	Project plans, client requirements, deliverables	7 years after project closure

General Business Operations

Business Function	Examples of Documents	Retention Period
Marketing	Client proposals, project documentation, marketing materials	7 years post-project or post-financial year
Contracts and Legal Agreements	Vendor contracts, NDAs, non-client contracts	7 years after contract expiry
Audit Records	Internal/external audit records, compliance documents	7 years post-audit completion
Financial Records	Accounts, financial statements, tax returns	Minimum 7 years post-financial year

***NOTE:**

Basic details, such as, ResID, Name, Dates of Employment, Company, Job Title, Employment Type will be retained indefinitely (to enable the provision of reference requests/employment checks)