

GDPR Data Retention Policy (England)

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Policy Contact	Matthew Betteridge
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Target Audience	Staff
Approved by	OneCall24 Policy Team

This policy defines OneCall24 Limited’s approach to data retention in accordance with the UK GDPR and the Data Protection Act 2018. It outlines how long personal data is retained, how it is safeguarded, and the procedures for its secure disposal. This policy applies to all staff and contractors.

It sets the required retention periods for specified categories of personal data and sets out the minimum standards to be applied when destroying certain information within OneCall24 Limited.

The Policy consists of the following sections and applies to all staff without exception.

1. Retention Rules.
2. Safeguarding of Data during Retention Period.
3. Destruction of Data.
4. Breach, Enforcement and Compliance.
5. Document Disposal.
6. Appendix – Data Retention Schedule.

Adherence forms part of the employee’s terms and conditions of employment and any breaches of policy may be considered a disciplinary offence and could lead to dismissal.

1. Retention Rules.

Retention periods are defined in the Data Retention Schedule (Appendix). Where no retention period is specified, personal data must not be retained by default.

The appropriate retention period will be determined by reference to the purpose of processing and one or more of the following criteria:

- statutory or regulatory retention requirements
- contractual requirements
- limitation periods for potential legal claims
- operational necessity, subject to periodic review

Personal data must be reviewed and assigned to an approved retention category as soon as practicable.

Retention periods may be extended in cases such as:

- Ongoing regulatory or legal investigations
- Legal claims or proceedings

The GDPR Owner, Matthew Betteridge (Chief Executive Officer), is responsible for defining and reviewing retention periods. OneCall24 is not legally required to appoint a statutory Data Protection Officer under Article 37 UK GDPR.

Employment and worker records are generally retained for seven years after last assignment, reflecting statutory limitation periods for potential claims, together with an additional period necessary to meet regulatory, contractual, audit and evidential requirements in a heavily regulated environment.

Where a Subject Access Request is received, the retention or deletion of relevant personal data is managed in accordance with the organisation's Subject Access Request Policy, and normal retention periods are suspended while the request is being processed.

2. Safeguarding of Data during Retention Period.

The potential deterioration of storage media used for archiving must be taken into account. If electronic media are used, all procedures and systems necessary to ensure access to the information throughout the retention period (both in terms of the storage medium and the readability of file formats) must also be preserved. Responsibility for storage lies with the GDPR Owner

3. Destruction of Data.

OneCall24 Limited and its employees will, on a regular basis, review all data, whether held electronically on their device or on paper, to decide whether to destroy or delete any data once the purpose for which those documents were created is no longer relevant. See Appendix for the Data Retention Schedule. Overall responsibility for the destruction of data falls to the GDPR Owner.

Once the decision is made to dispose according to the Data Retention Schedule, the data should be deleted, shredded or otherwise destroyed to a degree equivalent to their value to others and their level of confidentiality. The method of disposal varies and is dependent upon the nature of the document. For example, any documents that contain sensitive or confidential information (and particularly sensitive personal data) must be disposed of as confidential waste and be subject to secure electronic deletion; some expired or superseded contracts may only warrant in-house shredding. The Document Disposal section below defines the mode of disposal.

The specific deletion or destruction process may be carried out either by an employee or by an internal or external service provider that the GDPR Owner subcontracts for this purpose. Any applicable general provisions under relevant data protection laws and OneCall24's Data Protection Policy shall be complied with.

Appropriate controls shall be in place that prevents the permanent loss of essential information of OneCall24 as a result of malicious or unintentional destruction of information.

The GDPR Owner shall fully document and approve the destruction process. The applicable statutory requirements for the destruction of information, particularly requirements under applicable data protection laws, shall be fully observed.

4. Breach, Enforcement and Compliance.

The GDPR Owner has the responsibility to ensure that each of OneCall24 Limited's offices comply with this Policy. It is also the responsibility of the GDPR Owner to assist any local office with enquiries from any local data protection or governmental authority. Any suspicion of a breach of this Policy must be reported immediately to GDPR Owner. All instances of suspected breaches of the Policy shall be investigated and action taken as appropriate.

Failure to comply with this Policy may result in adverse consequences, including, but not limited to, loss of customer confidence, litigation and loss of competitive advantage, financial loss and damage OneCall24 Limited's reputation, personal injury, harm or loss. Non-compliance with this Policy by permanent, temporary or contract employees, or any third parties, who have been granted access to OneCall24 Limited premises or information, may therefore result in disciplinary proceedings or termination of their employment or contract. Such non-compliance may also lead to legal action against the parties involved in such activities.

5. Document Disposal.

Records which may be routinely destroyed unless subject to an on-going legal or regulatory inquiry are as follows:

- Announcements and notices of day-to-day meetings and other events including acceptances and apologies.
- Requests for ordinary information such as travel directions.
- Reservations for internal meetings without charges / external costs.
- Transmission documents such as letters, fax cover sheets, e-mail messages, routing slips, compliments slips and similar items that accompany documents but do not add any value.
- Message slips.
- Superseded address list, distribution lists etc.
- Duplicate documents such as CC and FYI copies, unaltered drafts, snapshot printouts or extracts from databases and day files.
- Stock in-house publications which are obsolete or superseded.
- Trade magazines, vendor catalogues, flyers and newsletters from vendors or other external organizations.

In all cases, disposal is subject to any disclosure requirements which may exist in the context of litigation.

Confidential documents (i.e. those containing highly sensitive or personal data) shall be disposed of using an approved disposal firm that provides locked containers for secure in-office document disposal. These containers are collected on a regular basis, and the contents are securely shredded. Confidential electronic information shall be subject to secure deletion using appropriate data destruction methods to ensure it cannot be recovered or reconstructed.

Proprietary documents (i.e. those that contain confidential information such as parties' names, signatures and addresses, or which could be used by third parties to commit fraud, but which do not contain any personal data) should be cross-cut shredded and then placed into locked rubbish bins for collection by an approved disposal firm, and electronic documents will be subject to secure electronic deletion.

All other documents (i.e. those that do not contain any confidential information or personal data and are published OneCall24 documents) should be strip-shredded or disposed of through an approved disposal firm and include, among other things, advertisements, catalogues, flyers, and newsletters. These may be disposed of without an audit trail.

If you require further information regarding any aspect of this policy, please contact your line manager.

Appendix – Data Retention Schedule

Where records are marked as ‘Indefinite’, retention is necessary to comply with ongoing statutory, regulatory, or corporate governance obligations. Such records are retained under Article 6(1)(c) (legal obligation) or Article 6(1)(f) (legitimate interests) UK GDPR and are subject to periodic review to confirm continued necessity.

Financial Records

Personal data record category	Mandated retention period	Record owner
Payroll records	Ten years after audit	Finance
Supplier contracts	Ten years after contract is terminated	Finance
Chart of Accounts	Retained as corporate archival records for so long as necessary for ongoing governance obligations, subject to necessity review every 5 years	Finance
Fiscal Policies and Procedures	Retained as corporate archival records for so long as necessary for ongoing governance obligations, subject to necessity review every 5 years	Finance
Permanent Audits	Retained as corporate archival records for so long as necessary for ongoing governance obligations, subject to necessity review every 5 years	Finance
Financial statements	Retained as corporate archival records for so long as necessary for ongoing governance obligations, subject to necessity review every 5 years	Finance
General Ledger	Retained as corporate archival records for so long as necessary for ongoing governance	Finance

	obligations, subject to necessity review every 5 years	
Investment records (deposits, earnings, withdrawals)	Seven years	Finance
Invoices	Seven years	Finance
Cancelled checks	Seven years	Finance
Bank deposit slips	Seven years	Finance
Business expenses documents	Seven years	Finance
Check registers/books	Seven years	Finance
Property/asset inventories	Seven years	Finance
Credit card receipts	Seven years	Finance
Petty cash receipts/documents	3 years	Finance

Business Records

Personal data record category	Mandated retention period	Record owner
Article of Incorporation to apply for corporate status	Retained as corporate archival records for so long as necessary for ongoing governance obligations, subject to necessity review every 5 years	Finance
Board policies	Retained as corporate archival records for so long as necessary for ongoing governance obligations, subject to necessity review every 5 years	Finance

Board meeting minutes	Retained as corporate archival records for so long as necessary for ongoing governance obligations, subject to necessity review every 5 years	Finance
Tax or employee identification number designation	Retained as corporate archival records for so long as necessary for ongoing governance obligations, subject to necessity review every 5 years	Finance
Office and team meeting minutes	Retained as corporate archival records for so long as necessary for ongoing governance obligations, subject to necessity review every 5 years	Finance
Annual corporate filings	Retained as corporate archival records for so long as necessary for ongoing governance obligations, subject to necessity review every 5 years	Finance

HR: Employee and Candidate Records

Personal data record category	Mandated retention period	Record owner
Disciplinary, grievance proceedings records, oral/verbal, written, final warnings, appeals	As per legal requirement; for such period as required by policies or potential legal claim arising from same	HR
Applications for jobs, interview notes – Recruitment/promotion panel Internal: Where the candidate is unsuccessful and has not been made compliant Where the candidate is successful	Archived as ‘Do Not Use’ after six months. Seven years after last assignment	HR

Payroll input forms, wages/salary records, overtime/bonus payments Payroll sheets, copies	Seven years after last assignment	HR
Bank details – current	Duration of employment	HR
Payrolls/wages	Duration of employment	HR
Job history including staff personal records: contract(s), Ts & Cs; previous service dates; pay and pension history, pension estimates, resignation/termination letters	Seven years after last assignment	HR
Employee address details	Seven years after last assignment	HR
Expense claims	As per legal requirement	HR
Annual leave records	Seven years after last assignment	HR
Accident books Accident reports and correspondence	As per legal requirement	HR
Certificates and self-certificates relating to Compliance and Competencies	Seven years after last assignment	HR
Pregnancy/childbirth certification	Seven years after last assignment	HR
Parental leave	Seven years after last assignment	HR
Maternity pay records and calculations	Seven years after last assignment	HR
Redundancy details, payment calculations, refunds, notifications	Seven years after last assignment	HR

Training and development records	Seven years after last assignment	HR
CRM data – inclusive of Name, Photo, Email address, mobile number, address, emails and phone call summaries, DPO information	Seven years after signing contract, compliance lapsing or earlier where a valid erasure request applies and no overriding legal or regulatory retention obligation exists	Registration & Compliance

Contracts

Personal data record category	Mandated retention period	Record owner
Signed	Retained for 15 years after termination/completion, unless longer retention is required for legal claims, regulatory investigation, or audit obligations	Finance
Contract amendments	Retained for 15 years after termination/completion, unless longer retention is required for legal claims, regulatory investigation, or audit obligations	Finance
Successful tender documents	Retained for 15 years after termination/completion, unless longer retention is required for legal claims, regulatory investigation, or audit obligations	Finance
Unsuccessful tenders' documents	Retained for 15 years after termination/completion, unless longer retention is required for legal claims, regulatory investigation, or audit obligations	Finance
Tender – user requirements, specification, evaluation criteria, invitation	Retained for 15 years after termination/completion, unless longer retention is required for	Finance

	legal claims, regulatory investigation, or audit obligations	
Contractors' reports	Retained for 15 years after termination/completion, unless longer retention is required for legal claims, regulatory investigation, or audit obligations	Finance
Operation and monitoring, eg complaints	Retained as corporate archival records for so long as necessary for ongoing governance obligations, subject to necessity review every 5 years	Finance

Customer Data

Personal data record category	Mandated retention period	Record owner
CRM data – inclusive of Name, Email address, mobile number, address, emails and phone call summaries, DPO information	Seven years after last assignment or earlier where a valid erasure request applies and no overriding legal or regulatory retention obligation exists	Business Systems Administrator
Metrics data	Seven years after last assignment or earlier where a valid erasure request applies and no overriding legal or regulatory retention obligation exists	Business Systems Administrator

Non – Customer Data

Personal data record category	Mandated retention period	Record owner
Name, email address	Kept until person unsubscribes / requests to be removed from system	Marketing & Sales

IT

Personal data record category	Mandated retention period	Record owner
Recycle Bins	Cleared monthly	Individual employee
Downloads	Cleared monthly	Individual employee
Inbox	Emails (including any attachments) that do not constitute a business or personal data record may be deleted as part of routine housekeeping, typically within 30–90 days. Email content that forms a business or personal data record must be retained in accordance with the Data Retention Schedule	Individual employee
Deleted Emails	Cleared monthly	Individual employee
Personal Network Drive	Reviewed quarterly, deleted after ten years.	Individual employee
Local Drives & files	Moved to network drive monthly, then deleted from local drive.	Individual employee
Shared Drives, Drop box	Reviewed quarterly, deleted after seven years.	Individual employee

Review

This policy statement will be reviewed annually as part of our commitment to upholding professional standards. It may be altered from time to time in the light of legislative changes, operational procedures or other prevailing circumstances.