

# Retention & Archiving Policy

## Youth Start Limited

Company Number: 16864238

Registered Office: 370 Osmaston Park Road, Derby, DE24 8FB

Website: [youthstart.co.uk](http://youthstart.co.uk)

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## Effective Date

1 January 2026

## Last Updated

1 January 2026

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## Introduction

This Retention & Archiving Policy sets out Youth Start Limited's procedures for retaining, archiving, and disposing of records and information. Youth Start is committed to managing records in accordance with legal requirements, best practice guidance, and business needs.

This policy applies to all records and information held by Youth Start, including paper records, electronic records, emails, databases, and other forms of information. It outlines the retention periods for different types of records, the procedures for archiving and disposing of records, and the responsibilities of staff members.

Effective records management ensures that Youth Start can:

- Comply with legal and regulatory requirements
  - Protect the rights and interests of candidates, employers, staff, and other stakeholders
  - Support business operations and decision-making
  - Manage information securely and efficiently
  - Reduce storage costs and administrative burden
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## Purpose of This Policy

The purpose of this Retention & Archiving Policy is to:

- Ensure compliance with UK legislation and regulatory requirements
- Define retention periods for different types of records
- Provide clear procedures for archiving and disposing of records
- Protect personal data and confidential information

- Support business continuity and operational efficiency
  - Reduce legal and financial risks
  - Ensure that records are accessible when needed
  - Promote consistent and effective records management across Youth Start
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## Scope and Application

This policy applies to:

- All records and information created, received, or held by Youth Start
- All formats of records, including paper, electronic, email, audio, video, and other media
- All staff members, mentors, volunteers, and contractors who create or handle Youth Start records

This policy covers all types of records, including:

- Candidate records (applications, assessments, placement records, mentorship records)
  - Employer records (contracts, agreements, correspondence)
  - Staff records (employment contracts, personnel files, payroll records)
  - Financial records (invoices, receipts, accounts, tax records)
  - Operational records (policies, procedures, meeting minutes, reports)
  - Legal records (contracts, agreements, legal correspondence, insurance policies)
  - Marketing and communications records (website content, social media, newsletters)
  - Compliance records (health and safety, data protection, safeguarding)
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## Legal Framework

Youth Start operates in compliance with the following UK legislation and guidance:

- **Data Protection Act 2018 and UK GDPR:** Governs the retention and disposal of personal data
  - **Limitation Act 1980:** Sets time limits for legal claims (generally six years for contractual claims)
  - **Companies Act 2006:** Requires companies to retain certain financial and corporate records
  - **Employment Rights Act 1996 and Equality Act 2010:** Require retention of employment records
  - **Health and Safety at Work etc. Act 1974:** Requires retention of health and safety records
  - **Conduct of Employment Agencies and Employment Businesses Regulations 2003:** Requires retention of recruitment records
  - **Taxes Management Act 1970 and VAT Act 1994:** Require retention of financial and tax records
  - **HM Revenue & Customs (HMRC) guidance:** Provides guidance on retention of financial records
  - **Information Commissioner's Office (ICO) guidance:** Provides guidance on data retention and disposal
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# General Principles of Records Retention

Youth Start applies the following general principles to records retention:

## Lawfulness and Necessity

Records will only be retained for as long as necessary to fulfil the purpose for which they were collected, and in accordance with legal and regulatory requirements. Personal data will not be retained for longer than necessary.

## Business Need

Records will be retained for as long as they are needed to support business operations, decision-making, and accountability. Records that are no longer needed will be disposed of securely.

## Legal and Regulatory Compliance

Records will be retained for the minimum period required by UK legislation and regulatory guidance. Where different retention periods apply, the longest period will be applied.

## Risk Management

Records that may be needed to defend legal claims, support investigations, or demonstrate compliance will be retained for appropriate periods. Youth Start will consider legal, financial, and reputational risks when determining retention periods.

## Security and Confidentiality

Records will be stored securely throughout their lifecycle, and access will be restricted to authorised individuals. Confidential and personal data will be protected in accordance with the Data Protection Policy and Data Security Policy.

## Accessibility

Records will be stored in a manner that ensures they are accessible when needed. Archived records will be indexed and catalogued to enable retrieval.

## Disposal

Records will be disposed of securely at the end of their retention period. Disposal methods will ensure that confidential and personal data cannot be recovered or reconstructed.

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## Retention Periods

The following retention periods apply to different types of records held by Youth Start. These periods are based on UK legislation, regulatory guidance, and best practice.

## Candidate Records

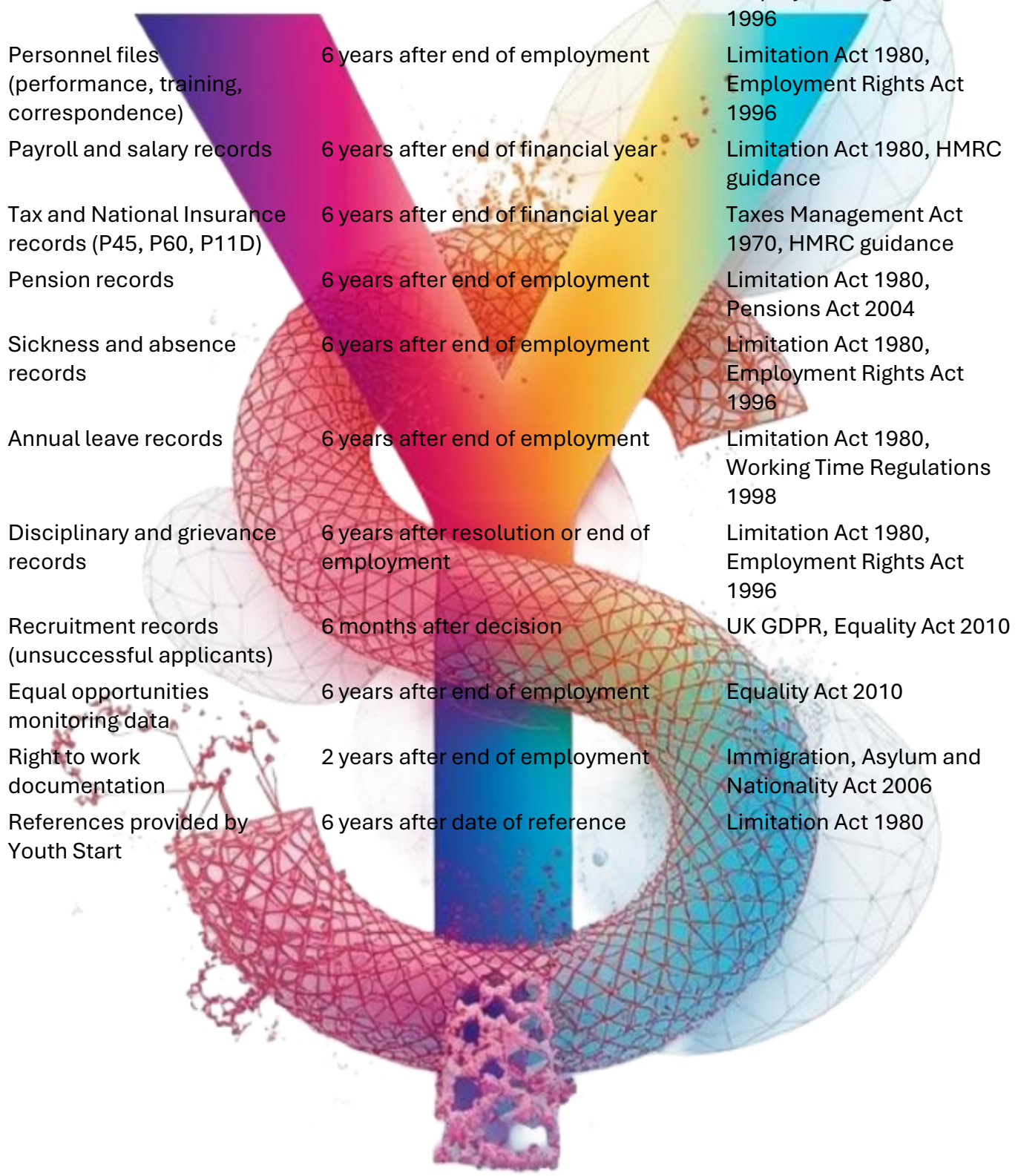
Record Type	Retention Period	Legal Basis
Candidate applications (successful)	6 years after end of placement	Limitation Act 1980, Conduct of Employment Agencies Regulations 2003
Candidate applications (unsuccessful)	6 months after application	UK GDPR, Conduct of Employment Agencies Regulations 2003
Candidate assessment and selection records	6 years after end of placement	Limitation Act 1980, Equality Act 2010
Candidate placement records	6 years after end of placement	Limitation Act 1980, Conduct of Employment Agencies Regulations 2003
Candidate mentorship records	6 years after end of placement	Limitation Act 1980, business need
Right to work documentation	2 years after end of placement	Immigration, Asylum and Nationality Act 2006
Background checks (DBS, references)	6 months after decision (if unsuccessful) or 6 years after end of placement (if successful)	DBS guidance, Conduct of Employment Agencies Regulations 2003
Candidate feedback and complaints	6 years after resolution	Limitation Act 1980
Candidate diversity and equal opportunities data	6 years after end of placement	Equality Act 2010

## Employer Records

Record Type	Retention Period	Legal Basis
Employer contracts and agreements	6 years after end of contract	Limitation Act 1980
Employer correspondence and communications	6 years after end of relationship	Limitation Act 1980, business need
Employer feedback and complaints	6 years after resolution	Limitation Act 1980
Employer invoices and payment records	6 years after end of financial year	Limitation Act 1980, HMRC guidance



## Staff Records



Record Type	Retention Period	Legal Basis
Employment contracts and offer letters	6 years after end of employment	Limitation Act 1980, Employment Rights Act 1996
Personnel files (performance, training, correspondence)	6 years after end of employment	Limitation Act 1980, Employment Rights Act 1996
Payroll and salary records	6 years after end of financial year	Limitation Act 1980, HMRC guidance
Tax and National Insurance records (P45, P60, P11D)	6 years after end of financial year	Taxes Management Act 1970, HMRC guidance
Pension records	6 years after end of employment	Limitation Act 1980, Pensions Act 2004
Sickness and absence records	6 years after end of employment	Limitation Act 1980, Employment Rights Act 1996
Annual leave records	6 years after end of employment	Limitation Act 1980, Working Time Regulations 1998
Disciplinary and grievance records	6 years after resolution or end of employment	Limitation Act 1980, Employment Rights Act 1996
Recruitment records (unsuccessful applicants)	6 months after decision	UK GDPR, Equality Act 2010
Equal opportunities monitoring data	6 years after end of employment	Equality Act 2010
Right to work documentation	2 years after end of employment	Immigration, Asylum and Nationality Act 2006
References provided by Youth Start	6 years after date of reference	Limitation Act 1980

## Financial Records

Record Type	Retention Period	Legal Basis
Annual accounts and financial statements	Permanently	Companies Act 2006
Bank statements and reconciliations	6 years after end of financial year	Limitation Act 1980, HMRC guidance
Invoices (sales and purchases)	6 years after end of financial year	Limitation Act 1980, HMRC guidance
Receipts and expense claims	6 years after end of financial year	Limitation Act 1980, HMRC guidance
VAT records	6 years after end of financial year	VAT Act 1994, HMRC guidance
Tax returns and supporting documents	6 years after end of financial year	Taxes Management Act 1970, HMRC guidance
Payroll records	6 years after end of financial year	Limitation Act 1980, HMRC guidance
Contracts and agreements (financial)	6 years after end of contract	Limitation Act 1980
Audit reports	Permanently	Companies Act 2006, best practice

## Corporate and Legal Records

Record Type	Retention Period	Legal Basis
Certificate of Incorporation	Permanently	Companies Act 2006
Articles of Association	Permanently	Companies Act 2006
Shareholder and director records	Permanently	Companies Act 2006
Board meeting minutes	Permanently	Companies Act 2006, best practice
Annual returns and confirmations	Permanently	Companies Act 2006
Insurance policies	6 years after expiry	Limitation Act 1980
Legal correspondence and advice	6 years after matter concluded	Limitation Act 1980
Contracts and agreements (non-financial)	6 years after end of contract	Limitation Act 1980
Intellectual property records (trademarks, copyrights)	Permanently	Intellectual property law, best practice



## Health, Safety, and Safeguarding Records

Record Type	Retention Period	Legal Basis
Health and safety risk assessments	6 years after superseded	Health and Safety at Work etc. Act 1974
Accident and incident reports	6 years after date of incident (or until age 21 if involving a minor)	Limitation Act 1980, Health and Safety at Work etc. Act 1974
Health and safety training records	6 years after end of employment or involvement	Health and Safety at Work etc. Act 1974
Safeguarding records and reports	6 years after case closed (or until age 25 if involving a young person)	Safeguarding best practice, Limitation Act 1980
DBS checks	6 months after decision (if unsuccessful) or 6 years after end of involvement (if successful)	DBS guidance

## Operational and Compliance Records

Record Type	Retention Period	Legal Basis
Policies and procedures (current versions)	Permanently	Business need, best practice
Policies and procedures (superseded versions)	6 years after superseded	Business need, audit trail
Data protection records (DPIAs, breach logs, consent records)	6 years after matter concluded	UK GDPR, ICO guidance
Complaints and dispute resolution records	6 years after resolution	Limitation Act 1980
Audit and inspection reports	6 years after date of report	Best practice, business need
Training records (staff, mentors, volunteers)	6 years after end of involvement	Business need, best practice

## Marketing and Communications Records

Record Type	Retention Period	Legal Basis
Website content (current)	Until superseded	Business need
Website content (archived)	3 years after superseded	Business need
Social media content	3 years after publication	Business need
Marketing materials and campaigns	3 years after campaign end	Business need
Email marketing records (consent, unsubscribes)	6 years after consent withdrawn	UK GDPR, business need
Photography and video consent forms	6 years after last use	UK GDPR, business need

## Archiving Procedures

Records that are no longer needed for day-to-day operations but must be retained for legal or business reasons will be archived.

### When to Archive

Records should be archived when:

- They are no longer needed for current business operations
- They must be retained for legal or regulatory reasons
- They may be needed for future reference or audit purposes

### Archiving Process

- Records will be reviewed regularly to identify those suitable for archiving
- Records will be indexed and catalogued before archiving to enable retrieval
- Paper records will be stored in secure, labelled boxes or files
- Electronic records will be stored in secure, backed-up folders or systems
- Archived records will be stored securely and access will be restricted to authorised individuals
- Archived records will be reviewed periodically to ensure they are still required

### Storage Locations

- Paper records: Secure storage at registered office or secure offsite storage facility
- Electronic records: Zoho CRM, password-protected USB backup, or secure cloud storage
- Access to archived records will be logged and monitored

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## Disposal Procedures

Records will be disposed of securely at the end of their retention period.

### When to Dispose

Records should be disposed of when:

- The retention period has expired
- The record is no longer needed for legal, regulatory, or business purposes
- The record has been superseded and the retention period for superseded records has expired

### Disposal Process

- Records will be reviewed regularly to identify those due for disposal



- Approval for disposal will be obtained from the relevant manager or Data Protection Lead
- A disposal log will be maintained to record what records were disposed of, when, and by whom

## Disposal Methods

**Paper Records:** - Confidential waste disposal (shredding or secure destruction service) - Shredding must render the document unreadable and unrecoverable - Disposal certificates will be obtained from third-party disposal services

**Electronic Records:** - Secure deletion using data erasure software that overwrites data multiple times - Physical destruction of storage media (hard drives, USB drives) if necessary - Deletion from cloud storage and backup systems - Disposal logs will record the method of deletion and who performed it

**Email:** - Permanent deletion from email systems and backup servers - Deletion from archived email folders

**Other Media:** - Audio and video recordings: Secure deletion or physical destruction - Photographs: Secure deletion or physical destruction

## Exceptions to Disposal

Records will not be disposed of if:

- They are subject to a legal hold (for example, due to ongoing litigation or investigation)
- They are subject to a Freedom of Information request or Subject Access Request
- They are needed for an ongoing audit or inspection
- There is a business reason to retain them beyond the standard retention period

In such cases, disposal will be postponed until the legal hold is lifted or the matter is concluded.

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## Responsibilities

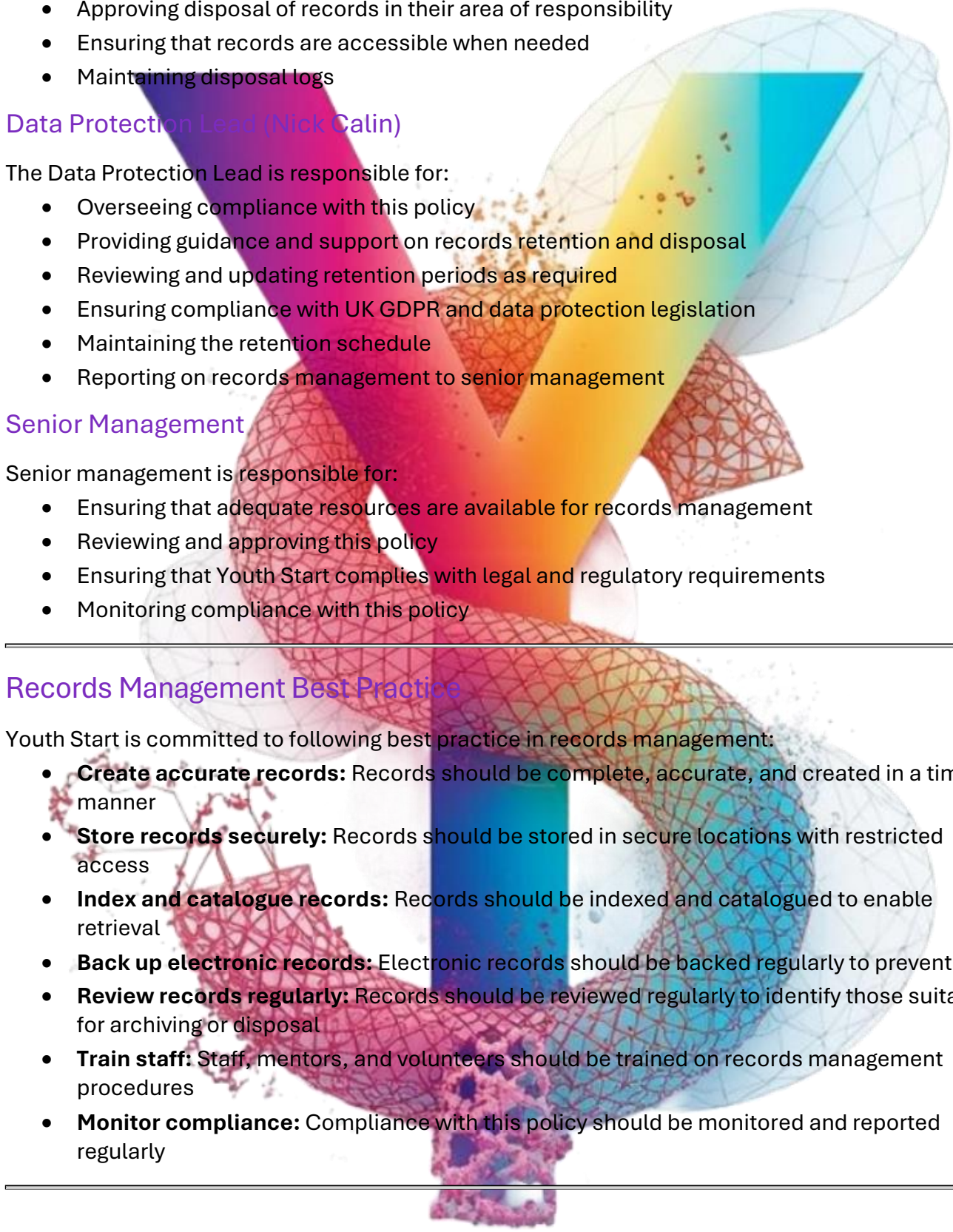
### All Staff, Mentors, and Volunteers

All staff, mentors, and volunteers are responsible for:

- Creating and maintaining accurate records
- Storing records securely in accordance with this policy
- Not retaining records for longer than necessary
- Disposing of records securely at the end of their retention period
- Reporting any concerns about records management to their manager or the Data Protection Lead

### Managers

Managers are responsible for:

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- Ensuring that staff, mentors, and volunteers comply with this policy
  - Reviewing records regularly to identify those suitable for archiving or disposal
  - Approving disposal of records in their area of responsibility
  - Ensuring that records are accessible when needed
  - Maintaining disposal logs

### Data Protection Lead (Nick Calin)

The Data Protection Lead is responsible for:

- Overseeing compliance with this policy
- Providing guidance and support on records retention and disposal
- Reviewing and updating retention periods as required
- Ensuring compliance with UK GDPR and data protection legislation
- Maintaining the retention schedule
- Reporting on records management to senior management

### Senior Management

Senior management is responsible for:

- Ensuring that adequate resources are available for records management
- Reviewing and approving this policy
- Ensuring that Youth Start complies with legal and regulatory requirements
- Monitoring compliance with this policy

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### Records Management Best Practice

Youth Start is committed to following best practice in records management:

- **Create accurate records:** Records should be complete, accurate, and created in a timely manner
  - **Store records securely:** Records should be stored in secure locations with restricted access
  - **Index and catalogue records:** Records should be indexed and catalogued to enable retrieval
  - **Back up electronic records:** Electronic records should be backed regularly to prevent loss
  - **Review records regularly:** Records should be reviewed regularly to identify those suitable for archiving or disposal
  - **Train staff:** Staff, mentors, and volunteers should be trained on records management procedures
  - **Monitor compliance:** Compliance with this policy should be monitored and reported regularly
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## Data Protection and Confidentiality

All personal data and confidential information will be handled in accordance with the Data Protection Policy, Data Security Policy, and UK GDPR requirements.

When retaining and disposing of records containing personal data, Youth Start will:

- Only retain personal data for as long as necessary
  - Ensure that personal data is stored securely and access is restricted
  - Dispose of personal data securely to prevent unauthorised access or disclosure
  - Comply with individual rights (right to erasure, right to rectification, right to access)
  - Maintain records of data processing activities, including retention and disposal
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## Monitoring and Review

This Retention & Archiving Policy is reviewed annually to ensure that it remains current and effective. The review considers:

- Changes to UK legislation or regulatory guidance
- Changes to Youth Start's operations or business needs
- Feedback from staff and stakeholders
- Incidents or concerns relating to records management
- Best practice guidance from the ICO and other regulatory bodies

Youth Start will monitor compliance with this policy through:

- Regular audits of records management practices
  - Review of disposal logs
  - Feedback from staff and managers
  - Data protection impact assessments
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## Contact Information

If you have any questions about this Retention & Archiving Policy, or if you need guidance on retaining or disposing of records, please contact Youth Start Limited using the following contact details:

### **Youth Start Limited**

Registered Office: 370 Osmaston Park Road, Derby, DE24 8FB

Email: [contact@youthstart.co.uk](mailto:contact@youthstart.co.uk)

Telephone: 07470435603

Website: [youthstart.co.uk](http://youthstart.co.uk)

**Data Protection Lead:** Nick Calin ([contact@youthstart.co.uk](mailto:contact@youthstart.co.uk))

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## Relationship with Other Policies

This Retention & Archiving Policy should be read in conjunction with the following policies:

- Data Protection Policy
- Data Security Policy
- Data Retention Policy
- Candidate Privacy Notice
- Staff Privacy Notice
- Complaints & Dispute Resolution Policy
- Safeguarding Policy
- Health & Safety Policy

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**Last Updated:** 1 January 2026

**Next Review Date:** 1 January 2027

