
ARCHIVING AND RETENTION OF RECORDS POLICY

Prepared By:

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Signed:



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31/01/2025	2.0	Archiving and Retention of Records Policy	Inclusion of Building Safety Regulator / Golden Thread	Stuart Leak 26/08/2025	DB2
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PART 1 | POLICY STATEMENT

The purpose of this document is to summarise the requirements and policy going forward in relation to the retention of paper / hard copies of documentation in the interests of making the most efficient use of the space we have available. All staff have to adhere to this policy.

POLICY – BROAD PRINCIPLES

Data Protection Laws has led the Company to plan appropriately for retaining documentation.

- To the extent that documents are stored electronically (and securely backed up) then we should not seek to duplicate their storage unless there are legal or regulatory reasons to do so. As a result, any paper copies of these documents can and should be destroyed.
- It is recognised that there are certain documents which we need to retain / archive paper copies. In relation to these, all retention is the responsibility of the relevant department in terms of tracking and advising what should be retained / destroyed (i.e. HR for employee data, Finance for financial information). The Finance and Administration team will support this through the removal, storage, retrieval and destruction of documents as appropriate.
- For specific types of documents, the following guidelines are expected to be adhered to:
 - Training / Professional Certificates. As a general principle, certificates are to be sent to employees on passing. Where records kept in-house, to be retained a maximum of 5 years (shorter where relevant body allows).
 - Employee records (contract agreements, induction forms, appraisals, etc.) to be kept for 15 years (i.e. 15 years from the end of March following the financial year-end).
 - Project work and correspondence to be archived after 5 years kept for 15 years.
 - HR and Finance documents – assuming all scanning is done, no archiving requirement.

PART 2 | ARCHIVING AND RETENTION OF RECORDS

1. SUMMARY OF MAIN REQUIREMENTS FOR RETENTION OF DOCUMENTS

- HR – majority of records need to be kept for duration of employment. Salary / payroll information to be kept for 15 years. All information being scanned in, so should do away with the need to retain hard-copy information
- Finance – accounting records generally kept for 6 years. All information being scanned in, so should do away with the need to retain hard-copy information
 - Project files, etc. – no legal requirement
- It is the responsibility of the individual Heads of Departments to ensure that records are kept in line with the retention periods listed above.

2. ARCHIVING

General Procedure:

- All documents to be stored electronically should be placed in the archive folder on the internal server and clearly marked with the following information:
 - Responsible person and department
 - Brief description of contents
 - Date of archiving (i.e. the current date)
 - Date for destruction. This is expected to be in line with the above guidelines

Going forward, the administrative team will only archive documents which adhere to the above retention criteria – any exceptions will require sign-off from a member of SMT.

3. RESPONSIBILITY OF KEY STAFF AND MONITORING COMPLIANCE

- It is the responsibility of the individual Heads of Departments to ensure that records are kept in line with the retention periods listed above.
- The following roles are responsible for checking compliance via spot checks.

PART 3 | BUILDING SAFETY ACT / GOLDEN THREAD

1. INTRODUCTION

Keelagher Okey Associates Ltd recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the archiving and retention of data. Records provide evidence for protecting the legal rights and interests of the organisation and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

2. SCOPE

This policy applies to all records created, received or maintained by employees of Keelagher Okey Associates Ltd in the course of carrying out its functions.

Records are defined as all those documents which facilitate the business carried out by Keelagher Okey Associates Ltd and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

3. RESPONSIBILITIES

Keelagher Okey Associates Ltd has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Managing Director.

The Managing Director is responsible for records management within the organisation, will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. The Managing Director will also monitor compliance with this policy by surveying, at least annually, to check if records are stored securely and can be accessed appropriately.

Individual colleagues must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with Keelagher Okey Associates Ltd's records management guidelines.

4. RELATIONSHIP WITH EXISTING POLICIES

This policy has been drawn up within the context of the Keelagher Okey Associates Ltd's Data Protection Policy and with other legislation or regulations (including audit, equal opportunities and ethics).

ANNEX 1 - PROCEDURE

Classification No.	Description	Retention
1.1 Legal Framework	Records documenting the establishment and development of the company's legal framework.	Life of organization
1.2 Company Structure	Records documenting the establishment and development of the company's legal structure.	Life of organization
1.3 SMT	Records documenting the appointment of members of the company's SMT	Termination of appointment + 6 years
1.3 All employees	Records documenting the provision of training and development for employees	Current year + 5 years
1.3 All employees	Register of Interests of members of the senior staff and others covered by conflict of interest policies.	Termination of appointment + 6 years
1.3 All employees	Records documenting the organisation of meetings of the company's SMT.	Current year + 1 year
1.3 All employees	Records documenting the conduct and proceedings of meetings of the company's SMT.	Current year + 15 years
1.4 Management of SMT	Records documenting the development and establishment of terms of reference for the company's SMT.	Life of company
1.4 Management of SMT	Records documenting the provision of training and development for members of the company's executive committees.	Current year + 3 years
1.4 Management of SMT	Records documenting the organisation of meetings of the company's executive committees.	Current year + 1 year
1.4 Management of SMT	Records documenting the conduct and proceedings of meetings of the company's executive committees.	Current year + 15 years
1.5 Appointment of Senior team	Records documenting the appointment and designation of the company's SMT.	Termination of appointment + 5 years
1.6 Strategic Planning and Performance	Records documenting the development of the company's policies on strategic planning and performance management.	Superseded + 10 years
1.6 Strategic Planning and Performance	Records documenting the development of the company's overall strategic plan.	Superseded + 10 years

Classification No.	Description	Retention
1.6 Strategic Planning and Performance	Records containing reports on the company's performance against its strategic plan.	Current financial year + 10 years
1.6 Strategic Planning and Performance	Records documenting the conduct and results of audits and reviews of the strategic planning and performance management function, and responses to the results.	Current academic year + 5 years
1.7 Organisational Strategy, Development and Performance	Records documenting the development of the company's organisational development strategy.	Superseded + 5 years
1.7 Organisational Strategy, Development and Performance	Records documenting the development of plans for the implementation of the company's organisational development strategy.	Superseded + 5 years
1.7 Organisational Strategy, Development and Performance	Records documenting the conduct and results of audits and reviews of the organisational development function, and responses to the results.	Current year + 5 years
1.7 Organisational Strategy, Development and Performance	Records documenting the management of individual organisational restructuring processes.	Completion of process + 5 years
1.8 Contingency/Risk Planning and Management	Records documenting the development and testing of the company's risk management strategy.	Current Year+10
1.8 Contingency/Risk Planning and Management	Records documenting the development and establishment of the company's risk management strategy.	Superseded + 5 years
1.8 Contingency/Risk Planning and Management	Records documenting the development and establishment of the company's risk management procedures.	Superseded + 3 years
1.8 Contingency/Risk Planning and Management	Records documenting the conduct and results of audits and reviews of the risk management function, and responses to the results.	Current Year+5
1.8 Contingency/Risk Planning and Management	Records documenting identified risks to the company and assessments of those risks.	Superseded + 1 year
1.9 Quality Management	Records documenting the development and establishment of the company's overall quality management policies.	Superseded + 5 years
1.9 Quality Management	Records documenting the development of the company's quality management procedures.	Superseded + 3 years
1.9 Quality Management	Records documenting the conduct and results of quality audits, and action taken to address issues raised.	Completion of audit + 3 years

Classification No.	Description	Retention
1.9 Quality Management	Records documenting the attainment and maintenance of the company's accreditation under established independent quality management schemes.	Termination of accreditation + 1 year
1.9 Quality Management	Complaints System and Procedures.	5 years
1.9 Quality Management	Public Complaints.	3 years
1.11 Audit	Records documenting the company's audit strategy.	Superseded + 5 years
1.11 Audit	Records documenting the development and establishment of the company's audit policies.	Superseded + 5 years
1.11 Audit	Records documenting the development of the company's audit procedures.	Superseded + 3 years
1.11 Audit	Records documenting the conduct and results of audits, and action taken to address issues raised.	Completion of audit + 5 years
1.12 Legal Matters	Records documenting the development and establishment of the company's policies on legal affairs and the acquisition/provision of legal services.	Superseded + 5 years
1.12 Legal Matters	Records documenting legal support for the negotiation, establishment and review of contracts and agreements between the company and third parties: - agreements and contracts under seal.	Termination of contract + 15 years
1.12 Legal Matters	Records documenting legal support for the negotiation, establishment and review of contracts and agreements between the company and others: - other contracts and agreements.	Termination of contract + 6 years
1.12 Legal Matters	Records documenting the provision of legal support and representation for the company in dealing with claims by or against the company which do not proceed to litigation or settlement by an agreement.	Settlement of claim + 6 years OR Withdrawal of claim + 6 years
1.12 Legal Matters	Records documenting legal advice requested by, and provided to, the company concerning: • interpretation of legislation affecting the company's legal framework, governance, responsibilities or operations • proposals for new legislation affecting the company's legal framework, governance, responsibilities or operations • the company's relationships with government bodies and HE regulators • industrial relations issues • - health, safety and environmental issues.	Life of company

Classification No.	Description	Retention
1.13 Health and Safety	KEELAGHER OKEY ASSOCIATES LTD will follow best practise and keep all Health and Safety records for up to five years. Risk assessments should be kept as long as the particular process or activity, to which the assessment refers to, is performed. Civil claims for injury should be held up to 3 years after an incident. Some records related to health risk must be held for up to 40 years, these are listed below: 1. List of persons exposed to Hazard Group 3 microbiological agents. 2. Records of monitoring of exposures to hazardous substances 3. Health records of personal under occupational health surveillance.	5 years / 40 years
1.14 BSA / Golden Thread	Audit and assessment records. ○ Permanently or until construction is demolished.	Life of organization
1.14 BSA / Golden Thread	Project specific manuals, systems, calibration records. ○ Permanently or until construction is demolished	Life of organization
1.14 BSA / Golden Thread	Non-specific project records. ○ 6 years from completion of project.	6 years

Classification No.	Description	Retention
1.14 BSA / Golden Thread	Information, records or correspondence required under or for claims under the Building Safety Act 2022 (BSA), Fire Safety (England) Regulations 2022 or Defective Premises Act 1972 including without limitation, building safety information or records, plans, reports, assessments or certificates safety cases and prescribed information under BSA golden thread requirements ○ For projects under which claims have accrued before 28 June 2022 - 30 years from completion of project. For projects to be completed or which claims have accrued after 28 June 2022 -15 years from completion of project. ○ Physical original hard copy and digital copy. Format to meet BSA 'golden thread' requirements once available. ○ The Building Safety Act 2022 (BSA), Fire Safety (England) Regulations 2022 and Defective Premises Act 1972 as amended.	30 years



Name: Derek Bradshaw
Position: Managing Director
Date: 31st January 2026