

Data Retention Policy

Overview

Who the policy affects

The policy applies to all members or representatives of the organisation.

Purpose

This policy supports employees and representatives of Dewi Development Ltd to understand the length of time data produced or received must be kept by Dewi Development Ltd. The data includes paper, electronic, video or voice.

Scope

The policy includes all people representing the organisation from director to employee, temporary staff, sessional staff, agency staff, contractors and volunteers. All employees are included whether full time, part time, office based or home worker.

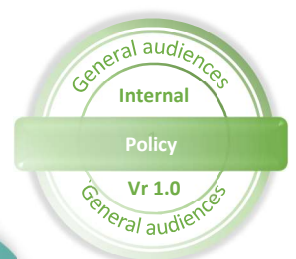
The policy covers all documents produced or received by Dewi Development Ltd.

The policy does not form part of the terms and conditions of employment with Dewi Development Ltd.

Effective Date

This policy applies from the 21 May 2019.

The company holds the right to update the policy at any time.



Policy

1. Requirements

- 1.1. There are different guiding principles as to how long data must be kept, including:
 - 1.1.1. Legal requirement
 - 1.1.2. Commercial requirement
 - 1.1.3. Business need
- 1.2. All data will be kept to meet these needs, supporting the customer, to meet statutory requirements, allowing for audit and to defend against claims.
- 1.3. All data produced should be considered as to the information it contains and the appropriate disposal. This is not limited to company documents, but includes information written on scraps of paper, post-it notes or electronic post-it notes on a phone or computer.

2. Timescales

- 2.1. The Information Officer will define how long different types of documents should be kept.
- 2.2. The Retention Schedule will provide a summary of retention timescales.
- 2.3. Individuals should consider how long to keep a document by reviewing the Retention Schedule.
- 2.4. If someone is unsure how long a document should be stored, they should liaise with Information Officer.

3. Classification

- 3.1. As data is created it will be classified as to how and when the data should be destroyed.
- 3.2. As part of document management, the classification will be defined on the document in the Document Information.
- 3.3. The three classification include:
 - 3.3.1. Not controlled
 - 3.3.2. Locally destroyed
 - 3.3.3. Securely destroyed
- 3.4. Any data electronically stored or written down, that contains personal identified information as per the GDPR regulations, should be handled as minimum of Locally destroyed.
- 3.5. Any non-company documents that contain no personal information, for example magazines, marketing leaflets can be handled as Not controlled.

4. Disposal

- 4.1. Data whether held in hard copy or electronically should be destroyed as per the classifications. These methods are:
 - 4.1.1. Not controlled – Where possible the data should be recycled, in-line with the environmental policy.
 - 4.1.2. Locally destroyed – All data must be shredded either electronically or in hard copy. Data should not be transferred to the waste until it has been shredded. In the case of hard drives or memory sticks, they must be electronically shredded or destroyed before being disposed.

- 4.1.3. Securely destroyed – All data must be handed over to a recognised and approved company for the secure destruction of data whether electronic or hard copy. All hard drives and memory sticks must be destroyed by the approved companies, with no items being directly disposed of.

5. Safeguarding data

- 5.1. Electronic data will be safeguard from hardware failure through servers implement with a minimum of RAID 1 and father-grandfather backup.
- 5.2. The deletion of data will mirror across the RAID and backups, but will take up to a month to complete across all backups.

6. Right to be forgotten

- 6.1. An individual can request their data is erased either verbally or in writing, defining what data is being requested to be deleted. In the case of verbal request, the request should be confirmed in writing to the individual.
- 6.2. The data erasure should take place within one month of request.
- 6.3. An identity check, confirming the individual is requesting deletion of their data.
- 6.4. The erasure should include live data and backups.
- 6.5. The data can be requested to be deleted where:
 - 6.5.1. The personal data is no longer required for purpose originally planned
 - 6.5.2. The personal data is held based on consent of the individual
 - 6.5.3. The person does not agree with legitimate interest reason the data is being held
 - 6.5.4. The data has been processed unlawfully
 - 6.5.5. The is a legal request
- 6.6. The erasure will not take place, where the data is being held:
 - 6.6.1. As part of legal requirement
 - 6.6.2. For the establishment, exercise or defence of a legal claim
- 6.7. The decision on the right to be forgotten will be informed to the individual in writing, with information on their right to complain to the ICO.

7. Breaches

- 7.1. Data that is not disposed of appropriately must be reported to the Information Officer.
- 7.2. Data that is not disposed of appropriately and causes a data breach of personal information must be reported by the Information Officer to the ICO within 72 hours.

Compliance

The failure to manage data retention, either due to failure to destroy data in-line with legislation or to inappropriately destroy data, may lead to disciplinary action or possible dismissal within the laws of the employing country.

Related Legislation

- ➔ General Data Protection Act (GDPR) 2018

Definitions

Term	Definition
Data	Covers data stored in systems, file received or sent, including paper documents, electronic files, pictures and sound files.
ICO	Information Commissioner's Office

Document Information

Document Control

Document Confidentiality	General Audiences
Confidentiality Classification	Internal
Document Owner	Information Officer
Approved By	David Husband
Approval Date	21/05/2019
First Published	21/05/2019
Review Date	
Related documents	Document Management Policy Retention Schedule Environmental Policy
Status	Published

Version

Version	Author	Date	Summary Changes
0.1	David Husband	21/05/2019	
1.0	David Husband	21/05/2019	Approved

Authors

Author	Company	Job Title	Department
David Husband	Dewi Development Ltd	Company Director	

Retention

Retention date	N/A
Retention details	Document is appropriate until replaced.

Disposal

Disposal classification	Not controlled
Disposal details	Document does not contain commercially sensitive information. Paper copies should be recycled.