

Data Retention & Erasure Policy

1 Purpose

WELDO recognizes that the efficient management of its data and records is necessary to support its core business functions, to comply with its legal, statutory and regulatory obligations, to ensure the protection of personal information and to enable the effective management of WELDO. This policy and related documents meet the standards and expectations set out by contractual and legal requirements and has been developed to meet the best practices of business records management, with the aim of ensuring a structured approach to document control.

The purpose of this document is to provide WELDO's statement of intent on how it provides a structured and compliant data and records management system. We define 'records' as all documents, regardless of the format; which facilitate WELDO's activities, and are thereafter retained to provide evidence of transactions and functions.

Such records may be created, received or maintained in hard copy or in an electronic format with the overall definition of records management being a field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use, distribution, storage and disposal of records.

2 Scope

This policy applies to all staff of WELDO (meaning permanent, fixed term, and temporary staff, any third-party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with WELDO). Adherence to this policy is mandatory and non-compliance could lead to disciplinary action.

3 Policy

Our Data Retention Policy and processes comply fully with the GDPR's fifth Article 5 principle:

"Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation')."

WELDO manages records efficiently and systematically, in a manner consistent with the GDPR requirements, and this policy is widely disseminated to ensure a standardised approach to data retention and records management.

Records will be created, maintained and retained to provide information about, and evidence of the WELDO's transactions, customers, employment and activities. Retention schedules will govern the period that records will be retained and will be found in the published Record Retention Schedule found in the annexure below.

It is WELDO's intention to ensure that all records and the information contained therein is:

- **Accurate** - records are regularly reviewed to ensure that they are a full and accurate representation of the transactions, activities or practices that they document;
- **Accessible** - records are always made available and accessible when required (with additional security permissions for select employees where applicable to the document content);
- **Complete** - records have the content, context and structure required to allow the reconstruction of the activities, practices and transactions that they document;
- **Compliant** - records always comply with any record keeping legal and regulatory requirements;
- **Monitored** – WELDO's system compliance with this Data Retention Policy is regularly monitored to ensure that the objectives and principles are being complied with at all times and that all legal and regulatory requirements are being adhered to.

3.1 Retention Period Protocols

All records retained during their specified periods are traceable and retrievable. Any file movement, use or access is tracked and logged. All WELDO and employee information is retained, stored and destroyed in line with legislative and regulatory guidelines.

For all data and records obtained, used and stored within the WELDO, we:

- a. Carry out periodical reviews of the data retained, checking purpose, continued validity, accuracy and requirement to retain;
- b. Establish periodical reviews of data retained;
- c. Establish and verify retention periods for the data, with special consideration given in the below areas:
 - the requirements of WELDO
 - the type of personal data
 - the purpose of processing
 - lawful basis for processing
 - the categories of data subjects
- d. Have processes in place to ensure that records pending audit, litigation or investigation are not destroyed or altered.
- e. Transfer paper based records and data to an alternative media format in instances of long retention periods (with the lifespan of the media and the ability to migrate data where necessary always being considered).

Where it is not possible to define a statutory or legal retention period, as per the GDPR requirement, WELDO will identify the criteria by which the period can be determined and provide this to the data subject on request and as part of our standard information disclosures and privacy notices.

3.2 Designated Owners

All systems and records have designated owners throughout their lifecycle to ensure accountability and a tiered approach to data retention and destruction. Owners are assigned based on role, business area and level of access to the data required. Data and records should never be, removed, accessed or destroyed without the prior authorization and knowledge of the designated owner.

3.3 Document Classification

WELDO has detailed Asset Management protocols for identifying, classifying, managing, recording and coordinating WELDO's assets (*including information*) to ensure their security and the continued protection of any confidential data they store or give access to. WELDO utilizes an **Information Asset Register (IAR)** to document and categorize the assets under its remit and carry out regular Information Audits to identify, review and document all flows of data within WELDO.

WELDO also carries out regular Information Audits which enable it to identify, categorize and record all personal information obtained, processed and shared by WELDO in its capacity as a controller and processor which has been compiled on a central register which includes:

- What personal data WELDO holds;
- Where it came from;
- Who WELDO shares it with;
- Legal basis for processing it;
- What format(s) is it in; • Who is responsible for it?
- Retention periods;
- Access level (i.e. full, partial, restricted etc).

WELDO's information audits and registers enable it to assign classifications to all records and data, thus ensuring that its aware of the purpose, risks, regulations and requirements for all data types.

WELDO utilizes 5 main classification types:

- Unclassified - information not of value and/or retained for a limited period where classification is not required or necessary
- Public - information that is freely obtained from the public and as such, is not classified as being personal or confidential
- Internal - information that is solely for internal use and does not process external information or permit external access
- Personal - information or a system that processes information that belongs to an individual and is classed as personal under the data protection laws
- Confidential - private information or systems that must be secured at the highest level and are afforded access restrictions and high user authentication

The classification is used to decide what access restriction needs to be applied and the level of protection afforded to the record or data. The classification along with the asset type, content and description are then used to assess the risk level associated with the information and mitigating action can then be applied.

3.4 Storage & Access of Records and Data

Documents are grouped together by category and then in clear date order when stored and/or archived. Documents are always retained in a secure location, with authorized personnel being the only ones to have access. Once the retention period has elapsed, the documents are reviewed, archived or confidentially destroyed dependent on their purpose, classification and action type.

3.5 Expiration of Retention Period

Once a record or data has reached its designated retention period date, the designated owner should refer to the retention register for the action to be taken. Not all data or records are expected to be deleted upon expiration; sometimes it is sufficient to anonymize the data in accordance with the GDPR requirements or to archive records for a further period.

3.6 Destruction and Disposal of Records & Data

All information on paper or electronic media must be securely destroyed when it is no longer required. This ensures compliance with the Data Protection laws and the duty of confidentiality we owe to our employees, learners and customers.

WELDO is committed to the secure and safe disposal of any waste and information assets in accordance with our contractual and legal obligations and that we do so in an ethical and compliant manner. We confirm that our approach and procedures comply with the laws and provisions made in the General Data Protection Regulation (GDPR) and that employees are trained and advised accordingly on the procedures and controls in place.

3.7 Paper Records

Due to the nature of our business, WELDO retains paper based personal information and as such, has a duty to ensure that it is disposed of in a secure, confidential and compliant manner. WELDO utilizes a professional shredding service provider to dispose of all paper materials.

Employee shredding machines are made available throughout the building and where we use a service provider for large disposals, regular collections take place and shredding is monitored to ensure that data is disposed of appropriately.

3.8 Electronic & IT Records and Systems

WELDO uses numerous systems, computers and technology equipment in the running of our business. From time to time, such assets must be disposed of and due to the information held on these whilst they are active; this disposal is handled in an ethical and secure manner.

The deletion of electronic records must be organized in conjunction with the IT Manager who will ensure the removal of all data from the medium so that it cannot be reconstructed. When records or data files are identified for disposal, their details must be provided to the designated owner to maintain an effective and up to date a register of destroyed records.

3.9 Internal Correspondence and General Memoranda

Unless otherwise stated in this policy or the retention periods register, correspondence and internal memoranda should be retained for the same period as the document to which they pertain or support (*i.e. where a memo pertains to a contract or personal file, the relevant retention period and filing should be observed*).

Where correspondence or memoranda that do not pertain to any documents having already been assigned a retention period, they should be deleted or shredded once the purpose and usefulness of the content ceases or at a maximum of 2 years.

Examples of correspondence and routine memoranda include (but are not limited to):

- Internal emails;
- Meeting notes and agendas;
- General inquiries and replies;
- Letter, notes or emails of inconsequential subject matter.

3.10 Erasure

In specific circumstances, data subjects' have the right to request that their personal data is erased, however WELDO recognizes that this is not an absolute '*right to be forgotten*'. Data subjects only have a right to have personal data erased.

3.11 Responsibilities

Heads of departments and information asset owners have overall responsibility for the management of records and data generated by their departments' activities, namely to ensure that the records created, received and controlled within the purview of their department, and the systems (*electronic or otherwise*) and procedures they adopt, are managed in a way which meets the aims of this policy.

The DPO must be involved in any data retention processes and records or all archiving and destructions must be retained. Individual employees must ensure that the records for which they are responsible are complete and accurate records of their activities, and that they are maintained and disposed of in accordance with WELDO's protocols.

3.12 Retention Periods

Annexure A of this policy contains WELDO's regulatory, statutory and business retention periods and the subsequent actions upon reaching said dates. Where no defined or legal period exists for a record, the default standard retention period is 6 years plus the current year (*referred to as 6 years + 1*).



Annexure A – Retention Register

RECORD	RETENTION PERIOD	ASSET OFFICER	ACTION
<i>Information, data or record</i>	<i>Period for retaining record & accompanying notes</i>	<i>Who is responsible for reviewing periods</i>	<i>Destroy, archive, review etc</i>
Accounting records	7 years	Head of Finance	
Income tax returns Income tax records Income tax correspondence	At least 3 years after the end of the financial year to which they relate	Head of Finance	
Statutory Maternity Pay records, calculations, certificates & related medical evidence	7 years	HR	
Wage/salary records, overtime, bonus & expenses	7 years	Head of Finance	
Interview Paperwork	1 year after recruitment campaign has finished unless consent to keep for longer	HR	Successful candidate paperwork transferred to personnel file Destroy all unsuccessful candidate paperwork
Staff Details <ul style="list-style-type: none"> • Date of Birth • Passport number and copy • Address • Email Address • Contact Telephone numbers • National Insurance number • Marital Status • Sex 	Retain and check currency whilst in employment Clear HR system and file when employee leaves Retain hard copy passport for 6 years after employee leaves	HR	Check accuracy of current data annually Clear HR System Destroy hard copy paperwork
Emergency Contact Details	When employees leaves	HR	Clear HR System and destroy hard copy paperwork
Contracts of employment (including amendments)	6 years after employee leaves	HR	Destroy all hard and soft copy paperwork
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Employee correspondence	6 years after employee leaves	HR	Destroy all hard and soft copy paperwork
Records of training	2 years after employee leaves	HR	Clear HR System and destroy hard copy paperwork
References received as part of recruitment	2 years after employee leaves	HR	Destroy hard copy paperwork
Medical Questionnaire	3 years after employee leaves	HR	Destroy hard copy paperwork
Appraisals	2 years after employee leaves	HR	Destroy hard and soft copy paperwork
Bank Details	Paper copy destroyed once added to banking system. Removed from online banking one month after employee's last salary payment has been made.	HR	Destroy hard copy paperwork Remove from online banking
Leave Records	Electronic leave form – 2 years after current leave year Remains on HR system until employee record deleted 6 years after employee leaves	HR	Destroy/Delete Delete employee from HR system
Working hours	6 years after employee leaves	HR	Destroy/Delete hard and soft copy paperwork
Sickness records	3 years after employee leaves	HR	Destroy/Delete hard and soft copy paperwork
Disciplinary Records	2 years after the employee leaves	HR	
Board Papers	Indefinitely	Operations Director	



Records documenting the firm's relationships and responsibilities to statutory and/or regulatory bodies and its legal responsibilities	Permanent	<i>Head of Finance</i>	
Business documents, policies, procedures,	Superseded + 6 years (then reviewed for archive value purposes)	<i>Operations Director</i>	