

**Stewardship Wills & Probate Ltd
Data Retention Policy**

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Document Control

Date of Revision	Version	Description	Author
16/05/2018	0.1	Initial Draft for review by Antonia Brinded	Blackmores (UK) Ltd

1 Purpose

The main aim of the retention policy is to enable Stewardship Wills & Probate Ltd to have better management of records to support the business in making decisions.

This policy is required to support the organised creation, retrieval, proper storage and preservation of Stewardship Wills & Probate Ltd essential records, and to enable identification and destruction of information where there is no continuing business, legal or historical significance. It also helps us to comply with the requirements of relevant legislation.

This policy covers all data retained in Stewardship Wills & Probate Ltd custody or control in whatever medium the data is contained in. It is therefore not restricted to paper documents, but also encompasses data contained in electronically readable format.

This policy should be read in conjunction with the data protection policy and any prevailing information security policies as their objectives also relate to the protection and security of data.

2 Scope

This document covers the following aspects, and applies to employees, temporary workers or subcontractors working on behalf of Stewardship Wills & Probate Ltd at all locations. We also expect consultants and goods & services providers to introduce and follow appropriate data retention practices.

Information that needs to be kept by law

Certain pieces of legislation set out types of information that should be kept and how long they should be kept for, for example, the Health and Safety at Work Act. Where there is a legal requirement to keep information by law, we must do this. There are limits as to how long information needs to be kept for legal purposes.

Information that has ongoing business value

This is information that is of value to Stewardship Wills & Probate Ltd, which is needed for both day to day activities and longer term strategic planning.

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You may find that some documents aren't listed within the retention schedule. The retention schedule lists the documents that it is essential to keep in line with the principles above.

If there is a definable ongoing business need to keep some information, then it will generally be acceptable to retain it for as long as it is needed.

Effective archives support the business by enabling us to use knowledge to make better decisions and to have records available that can help to understand how decisions were made or how we followed our processes if there is a query or challenge.

Storing information for longer than necessary creates cost for the business through either offsite archives or within our IT infrastructure, as well as the cost to the organisation of not being able to use our information resources effectively to support us in our work.

This policy applies to all records at Stewardship Wills & Probate Ltd, including electronic records.

3 Responsibilities

Roles	Responsibilities
Information Security/ Data Protection Officer	<ul style="list-style-type: none"> ▪ Responsible for the administration of this policy
IT Director	<ul style="list-style-type: none"> ▪ Responsible for establishing appropriate technical enforcement controls (e.g., Electronic Archives and back-ups)
Directors/ Managers	<ul style="list-style-type: none"> ▪ Responsible for ensuring that depositing and disposing of archive records happens effectively within their business areas. It is their responsibility to ensure that complete and accurate records are retained in line with legislative requirements and good practice. ▪ Directors and Managers shall be responsible for communicating these requirements to the relevant employees
Employees	<ul style="list-style-type: none"> ▪ Responsible for creation, use, management and preservation of the records in accordance with all statutory requirements. ▪ Employees leaving the company are responsible for returning any data held upon departure.

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4 Data Retention Policy

This policy will ensure that Stewardship Wills & Probate Ltd is complying with the golden rule of data protection which requires that we do not store material about our customers, staff or other people who could be identified that has no business use.

To comply we must:

- Only keep information for as long as there is a business need keep records secure, whether electronic or paper.
- Allow a person access to information held about them, should they request it.

Employees must:

- Destroy papers and electronic data for which there is no continuing business need and send papers that cannot be destroyed to archive for as short a time as possible
- Keep data secure while it remains in any office
- Keep track of where information is stored
- Continue to apply these good practices to avoid stockpiling papers in the future.

Freedom of Information (if applicable)

The Freedom of Information Act does not require organisations to keep all information in case it is requested. However, Stewardship Wills & Probate Ltd must be able to locate and retrieve information that we hold when it is requested. Failure to respond to a request in the allocated time can have repercussions including action from the Information Commissioner.

Stewardship Wills & Probate Ltd staff can continue to destroy records in line with this policy. The only exception is where information has been requested by under the Freedom of Information Act before the scheduled destruction date.

Archiving

Archiving is defined as secure storage of documents such that they are rendered inaccessible by authorised users in the course of day to day business, but which can be retrieved is so required/upon request.

Paper records must be archived in secure storage (offsite or onsite), with boxes/storage clearly labelled to include date of destruction.

Electronic records shall be archived in accordance with technical access controls and in a format that secures the confidentiality, integrity and availability of the documents.

Destruction and Disposal of Records

It is recognised that Stewardship Wills & Probate Ltd cannot retain all corporate data indefinitely. This is due to the financial cost of data storage, the need for well-structured

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records to aid information retrieval and legal challenges in retaining personal data about our customers for longer than there is a clear need to do so.

In general, records will not be retained beyond the lifespan indicated in the retention schedule unless the director/Manager of the originating department indicates otherwise.

The retention period is computed from the end of the financial year to which the records relate.

Destruction is defined as physical or technical destruction that is sufficient to render the information contained therein to be irretrievable by any ordinary commercial means.

At the end of their useful life, records should be confidentially destroyed. Stewardship Wills & Probate Ltd shall maintain and enforce suitable destruction methods appropriate to the type of information archived. Types include physical storage media such as CD-ROMs, DVD's, Hard Drives, backup tapes, Mobile Devices, Portable Devices or database records or backup files. Paper documents shall be shredded using secure locked consoles where appropriate. Shredded waste to be collected and disposed of by suitably vetted suppliers. This should be completed in line with the Document labelling transfer storage and deposition matrix.

Stewardship Wills & Probate Ltd liaises with any off-site archive providers to ensure that they cannot destroy our records without authorisation from Stewardship Wills & Probate Ltd. It is the responsibility of Stewardship Wills & Probate Ltd to order the destruction of the records.

There may incidences when the Legal Department/advisors may issue a litigation hold request to a Director/ Manager which requires the documents relating to a potential or actual litigation, or other claim or dispute, or regulatory action to be retained in accordance with instructions. These must be upheld in line with the instructions from the Legal Department/advisors.

5 Monitoring and Review of the Policy

This policy is reviewed regularly by Information Security/ Data Protection Officer

We will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives.