



# Morson Group

## Data Retention Policy

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## Document Control

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	Name	Signature	Date
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## **Purpose**

The purpose of this Policy is to ensure that necessary records and documents of Morson Group are adequately protected and maintained and to ensure that records that are no longer needed by Morson Group or are of no value are discarded at the proper time. This Policy is also for the purpose of aiding employees of Morson Group in understanding their obligations in retaining electronic documents – including e-mail, Web files, text files, sound and video files, PDF documents, and all Microsoft Office or other formatted files.

## **Policy**

This Policy represents Morson Group's policy regarding the retention and disposal of records and the retention and disposal of electronic documents.

## **Administration**

Attached as Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical records of Morson Group and the retention and disposal of electronic documents. The Compliance and Assurance Director of Morson Group (the "Administrator") is the Director in charge of the administration of this Policy and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed. The Administrator is also authorised to: make modifications to the Record Retention Schedule from time to time to ensure that it is in compliance with National legislation and includes the appropriate document and record categories for Morson Group; monitor legislation affecting record retention; annually review the record retention and disposal program; and monitor compliance with this Policy.

In addition, any retained information can only be used for the purpose for which it is stored. This is compliant with the Data Protection Act 1998 and the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)

## **Suspension of Record Disposal in the Event of Legal Proceedings or Claims**

There are certain occasions when information needs to be preserved beyond any limits set out in the Policy. The Policy must be SUSPENDED relating to a specific customer or document

and the information retained beyond the period specified in the Morson Group's Data Retention Schedule in the following circumstances:

- Legal proceedings or a regulatory or similar investigation or obligation to produce information are known to be likely, threatened or actual.
- A crime is suspected or detected.
- Information is relevant to a company in liquidation or receivership, where a debt is due to Morson Group.
- Information is considered by the owning unit to be of potential historical importance and this has been confirmed by the Administrator.
- In the case of possible or actual legal proceedings, investigations or crimes occurring, the type of information that needs to be retained relates to any that will help or harm Morson Group or the other side's case or liability or amount involved.
- If there is any doubt over whether legal proceedings, an investigation or a crime could occur, or what information is relevant or material in these circumstances, the Administrator should be contacted, and legal advice sought.
- The Administrator shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

## **Security of Personal Information**

Morson Group will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

Morson Group will store all personal information on our secure (password- and firewall-protected) servers.

The Client should acknowledge that the transmission of information over the internet is inherently insecure, and that Morson Group cannot guarantee the security of data sent over the internet.

The Client will be responsible for keeping their Username and Password used for accessing the Morson Group website confidential; Morson Group will not ask for password other than when needed to log in to our website.

## **Amendments**

Morson Group may update this policy from time to time by publishing a new version.

This page should be checked occasionally to ensure that the policy remains relevant.

## **Applicability**

This Policy applies to all physical records generated in the course of Morson Group's operation, including both original documents and reproductions. It also applies to the electronic documents described above.

This Policy was approved by the Board of Directors of Morson Group on 16<sup>th</sup> October 2017.

## **Appendix A Record Retention Schedule**

The Record Retention Schedule is organised as follows:

### **Section Topic**

Accounting and Finance

Contracts

Corporate Records

Correspondence and Internal Memoranda

Personal Information

Electronic Records

Insurance Records

Legal

Miscellaneous

Personnel Records

Tax Records

Health Records

Recruitment Sector

Salesforce

## Accounting and Finance

Record Type	Retention Period
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records, including work papers and other documents that relate to the audit	7 years after completion of audit
Annual Plans and Budgets	7 years
Bank Statements and Cancelled Cheques	7 years
Employee Expense Reports	7 years
Interim Financial Statements	7 years
Timesheets – hard copy	12 months

All records showing customer bank details must be locked in a desk drawer or a file cabinet when not in immediate use by staff or stored in Coda, Morson’s purchase ledger system.

## Contracts

Record Type	Retention Period
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	7 years after expiration or termination

## Corporate Records

Record Type	Retention Period
Corporate Records (minutes, signed minutes of the Board and all committees, record of incorporation, articles of incorporation, annual corporate reports)	Permanent
Licenses and Permits	Permanent

## Correspondence and Internal Memoranda

General Principle: Most correspondence and internal memoranda should be retained for the same period as the document to which they pertain or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract (7 years after expiration). It is recommended that records that support a particular project be kept with the project and take on the retention time of that particular project file.

Correspondence or memoranda that do not pertain to documents having a prescribed retention period should generally be discarded sooner. These may be divided into two general categories:



- 1) Those pertaining to routine matters and having no significant, lasting consequences should be discarded within five years. Some examples include:
  - Routine letters and notes that require no acknowledgment or follow up, such as notes of appreciation, congratulations, letters of transmittal, and plans for meetings.
  - Form letters that require no follow up.
  - Letters of general inquiry and replies that complete a cycle of correspondence.
  - Letters or complaints requesting specific action that have no further value after changes are made or action taken (such as name or address change).
  - Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.
  - Chronological correspondence files.
  - Please note that copies of interoffice correspondence and documents where a copy will be in the originating department file should be read and destroyed, unless that information provides reference to or direction to other documents and must be kept for project traceability.
  
- 2) Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.

## Retaining Personal Information

- 1) This Section sets out the data retention policies and procedure of Morson Group, which are designed to help ensure compliance with legal obligations in relation to the retention and deletion of personal information
- 2) Personal information that is processed by Morson Group for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Without prejudice to point 2 (above) Morson Group will usually delete personal data falling within the categories set out below at the date/time set out below:

Record Type	Retention Period
Information about a computer and about visits to and use of this website (including an IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)	2 years
Information provided when registering with our website (including email address)	2 years
Information provided when completing a profile on our website (including a name, gender, date of birth, interests and hobbies, educational details)	2 years

Information provided for the purpose of subscribing to email notifications and/or newsletters (including a name and email address)	Indefinitely or until the client chooses to 'unsubscribe'
Information provided when using the services on the website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use)	Indefinitely
Information relating to any subscriptions made (including name, address, telephone number, email address and sector sought)	2 years or until consent is withdrawn
Information posted to our website for publication on the internet	5 years after post
Information contained in or relating to any communications sent through the website (including the communication content and meta data associated with the communication)	2 years following contact
Any other personal information chosen to be sent	2 years following contact

Notwithstanding the other provisions of this Section, Morson Group will retain documents (including electronic documents) containing personal data:

- a) to the extent that Morson Group is required to do so by law;
- b) Morson Group believes that the documents may be relevant to any ongoing or prospective legal proceedings;
- c) and in order to establish, exercise or defend Morson Group's legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).
- d) as long as explicit consent is given by the data subject. Consent is requested at least every 2 years from candidates seeking contract roles and at least every 12 months for candidates seeking permanent employment.

Each day Morson Group will run a database backup copy of all electronic data contained on the Morson Group servers. This backup will include all information relating to all current users, as well as any information that remains on the server due to any reason contained in this policy. This database backup is a safeguard to retrieve lost information within a one-year retrieval period should users on the Morson Group system experience any problems. All data backups are stored in a separate location for a time period of 14 days prior to the backup initially being stored.

## Electronic Documents

- 1) Electronic Mail: Not all email needs to be retained, depending on the subject matter.

- All e-mail—from internal or external sources—is to be deleted after 12 months.
- Staff will strive to keep all but an insignificant minority of their e-mail related to business issues.
- Morson Group will archive e-mail for six months after the staff has deleted it, after which time the e-mail will be permanently deleted.
- Staff will take care not to send confidential/proprietary Morson Group information to outside sources
- Any e-mail staff deems vital to the performance of their job should be copied to the relevant client or candidate record in Talisman. (Morson’s CRM system).

2) Electronic Documents: including Microsoft Office Suite and PDF files. Retention also depends on the subject matter.

- PDF documents – The length of time that a PDF file should be retained should be based upon the content of the file and the category under the various sections of this policy. The maximum period that a PDF file should be retained is 6 years. PDF files the employee deems vital to the performance of his or her job should be copied to the relevant client or candidate record in Talisman. (Morson’s CRM system).
- Text/formatted files – Staff will conduct annual reviews of all text/formatted files (e.g., Microsoft Word documents) and will delete all those they consider unnecessary or outdated. After five years, all text files will be deleted from the network and the staff’s desktop/laptop. Text/formatted files the staff deems vital to the performance of their job should be printed and stored in the staff’s workspace.
- Morson Group does not automatically delete electronic files beyond the dates specified in this Policy. It is the responsibility of all staff to adhere to the guidelines specified in this policy.
- In certain cases, a document will be maintained in both paper and electronic form. In such cases the official document will be the electronic document.

## Insurance Records

Record Type	Retention Period
Certificates Issued to Morson Group	Permanent
Claims Files (including correspondence, medical records, injury documentation, etc.)	Permanent
Insurance Policies (including expired policies)	Permanent

## Legal Files and Papers

Record Type	Retention Period
Legal Memoranda and Opinions (including all subject matter files)	7 years after close of matter

Litigation Files	7 years after expiration of appeals or time for filing appeals
Court Orders	Permanent
Requests for Departure from Records Retention Plan	10 years

## Miscellaneous

Record Type	Retention Period
Material of Historical Value (including pictures, publications)	Permanent
Policy and Procedures Manuals – Original	Current version with revision history
Policy and Procedures Manuals Copies	Retain current version only
Annual Reports	Permanent

## Personnel Records

Record Type	Retention Period
Employee Personnel Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records)	6 years after separation
Employment Contracts – Individual	7 years after separation
Employment Records Correspondence with Employment Agencies and Advertisements for Job Openings	3 years from date of hiring decision
Job Descriptions	3 years after superseded
Home Office Right to Work Checks	2 years after termination

## Tax Records

General Principle: Morson must keep books of account or records as are sufficient to establish amount of gross income, deductions, credits, or other matters required to be shown in any such return.

These documents and records shall be kept for as long as the contents thereof may become material in the administration of state, and local income, franchise, and property tax laws.

Record Type	Retention Period
Tax-Exemption Documents and Related Correspondence	Permanent
Tax Bills, Receipts, Statements	7 years
Tax Returns	Permanent
Sales/Use Tax Records	7 years
Annual Information Returns	Permanent

## Health Records

Any radiation dosimetry / Health Records should be uploaded to Talisman. Existing reports and Life-time records should be kept securely.

## Recruitment Sector

All candidate CVs received via email should be uploaded to Talisman and the email immediately deleted. This will apply to any candidate CVs downloaded from online mediums such as Jobsites and LinkedIn. All candidate data once registered within talisman will be held for a 2 years period, after 2 years we will need the candidate to re-consent to Morson continuing to hold their personal data, the candidate can withdraw consent at any time. For those candidates who gain temporary work on assignment with Morson then their data will be held for the relevant periods as employees as per above retention periods (section 9.1.10 & 9.1.11).

Any email that has not been uploaded to talisman will be automatically deleted 12 months after receiving.

Record Type	Retention Period
Talisman Candidate data	2 years
Emails – (Not uploaded to talisman)	1 year

Processing of candidate personal data in respect of obtaining security clearance should not be left out on desks and should remain in a secure environment until the pack is completed and sent out to the Client. Duplicate copies should not be kept once submitted to the Client unless uploaded to Talisman. Any personal data received via email should be deleted after the Security pack is sent for processing. Any Disclosure Barring Service certificates held in Talisman should only be held for 6 month, after which date they are no longer transferrable.

Candidate CVs should not be held on desktops unless they are being uploaded to a Client E-Commerce system with the appropriate front sheet i.e. systems such as Fieldglass, I-Grasp etc. Once uploaded please delete off your desktop within 4 weeks.

Any radiation dosimetry / Health Records should be uploaded to Talisman. Existing reports and Life-time records should be kept securely.

Candidate hotlists held on shared drives / desktops should be deleted and replaced by using The Favourites List function on Talisman.

All candidate CVs submitted to Clients via email should be deleted after 4 week, ideally all CV submissions should be via the job in Talisman.

Any E2W documentation and associated Personal data held on email should be deleted immediately after uploading to Talisman.

## Salesforce

For the data retention information regarding Salesforce please refer to:

- MG/GDPR/PRO/001 – Salesforce GDPR Process

## Amendment Record

Issue	Issue Amendments	Date	Issued By
1	First Issue	June 2018	Nicola Hyde
	No changes	August 2019	Joshua Stodel
2	Section 9.1.13 – additional email retention period for information not on Talisman is now 12 months	March 2020	Joseph Mason
3	Rebrand	September 2020	Joshua Stodel