

## Records Retention and Destruction Policy

### Policy Statement

3D Recruit requires that different types of records be retained for a specific period of time to comply with UK legislation and good practice. 3D Recruit requires consistent treatment of records. Maintenance, retention, and disposal procedures for the Company's records must be followed systematically by all staff.

This policy is intended to ensure that the Company meets legal standards, and that documents are kept securely in line with the principles of GDPR and the Data Protection Act.

### Purpose

The purpose of this policy is to ensure that necessary records and documents are adequately protected and maintained and to ensure that records that are no longer needed or of no value are discarded at the appropriate time. Records management and retention policies apply to all records, regardless of format. In today's environment, employees create and maintain an increasing portion of their records using computers. Electronic records must be managed alongside traditional records to ensure compliance with the Data Protection Act and other UK legislation.

Individuals responsible for the retention of records are also responsible for the destruction of records following the retention period. Records must be destroyed by shredding or other means to ensure that all sensitive or confidential material can no longer be read or interpreted.

### Definitions

For the purpose of this policy, "record" shall be interpreted to mean: any papers, files, books, photographs, tapes, films, recordings, or other documentary materials, or any copies thereof, regardless of physical form or characteristics, made, produced, executed, or received by any staff member in connection with the transaction of 3D Recruit Ltd business.

The term "electronic record" means any record that is created, received, maintained or stored on local workstations or central servers. Examples include, but are not limited to:

1. Electronic mail (e-mail)
2. Word processing documents and spreadsheets
3. Databases – all data generated via automated information systems including but not limited to file records, investigation reports, financial accounting records, and payroll records.

"Official records" are the records maintained by the Office Manager.

Examples include, but are not limited to:

Accounts – all financial records, VAT records, payroll records, company bank accounts, etc

IT (Information Technology) – electronic records, etc.

Human Resources Office – Personnel records, insurance records, etc.

Managing Directors Office – Board minutes, etc.

## Procedures

Each department will retain a listing of major documents used and maintained by the department detailing retention and destruction timetables (schedules). These schedules should be in accordance with all UK legislation. In addition, each department will review annually its records and forms to determine whether retention of these records and forms is adequate and appropriate.

In the event of a governmental audit, investigation, or pending legal action, record disposal may be suspended at the direction of the Managing Director.

When legal action against 3D Recruit or its employees is filed or threatened, the law imposes a duty upon 3D Recruit to preserve all documents and records that pertain to the issues. As soon as 3D Recruit is made aware of pending or threatened legal action, the Managing Director will notify the appropriate employees/departments.

The litigation hold directive overrides any records retention schedule that may have otherwise called for disposal or destruction of the relevant documents. The Managing Director will inform employees/departments when litigation holds are cleared.

Any electronic documents such as e-mail and computer accounts will need to be immediately maintained by the appropriate departments as well as Information Resources until the hold is released. No employee or department who has been notified of a litigation hold may alter or delete any electronic records that falls within the scope of that hold. Violation of the hold may subject the individual to disciplinary action, up to and including dismissal, as well as personal liability for civil and/or criminal sanctions by the courts or law enforcement agencies.

In the event of an allegation being made against a member of staff or candidate of 3D Recruit, or concerns raised about an adult's behaviour around children, the NSPCC Records and Retention guidance will be consulted, to ensure records about child protection concerns are kept and managed in line with UK legislation and relevant official inquiries, such as the Independent Inquiry into Child Sexual Abuse (IICSA). <https://learning.nspcc.org.uk/media/1442/child-protection-records-retention-and-storage-guidelines.pdf>

## Records retention

Record retention periods may be increased by government regulation, judicial or administrative consent order, private or governmental contract, pending litigation or audit requirements. Such modifications supersede the requirements listed in this policy.

### Records Retention and Destruction Policy Tables

Type of Record	Retention Period
<u>Employee Applications and Employment Listings</u>	
Job Announcements and Advertisements	2 years
Documentation on Individuals not hired	2 years
Individuals who are hired	Active + 5 years
Individual employee files and wage history	Active + 7 years

Personal Files / Payroll Records

Employee files/documentation	Permanent
Salary or current rate of pay	Active + 7 years
Payroll Deductions	Active + 7 years
Timecards/sheets	Active + 7 years
Employee manuals/ Handbook	Permanent

Accounts and Financial Records

Billing Records	Active + 7 years
Tax Returns	Active + 7 years
Balance Sheet	Permanent
General Ledgers	Permanent
Account Ledgers	Permanent
Auditor's reports	Permanent

Electronic documents

Emails	2 years
Facsimiles	2 years
Scanned documents	2 years

Candidate Files

Safeguarding and Registration	Active + 2 years
Video Registration meetings	Active + 2 years
DBS checks	Active (Update Service) + 1 year
Legal / Complaint Files	Active + 7 years
Allegations, Investigations and Outcomes (regarding children)	Until normal retirement age or 10yrs whichever is longer (IRMS, 2019; Department for Education, 2021)
Malicious allegations	Destroyed immediately

No document list can be exhaustive. Questions regarding the retention period for any specific document or class of documents not included in the above table should be addressed to the Managing Director.

