

H. KEMP & SON LTD.

FUNERAL DIRECTORS

(ESTABLISHED 1893)

Retention Policy

1. Scope

All H Kemp and Son Ltd's records, whether analogue or digital, are subject to the retention requirements of this procedure.

2. Responsibilities

- 2.1 The following roles are responsible for retention of these records because they are the information asset owners.
- 2.2 Asset owners are responsible for ensuring that all personal data is collected, retained and destroyed in line with the requirements of the General Data Protection Regulation.
- 2.3 The Directors are responsible for retention of financial (accounting, tax) and related records.
- 2.4 The Directors are responsible for retention of all HR records.
- 2.5 The Directors are responsible for retention of all Health and Safety records.
- 2.6 The Directors responsible for retention of all other statutory and regulatory records.
- 2.7 The Directors are responsible for storage of data in line with this procedure.
- 2.8 The Directors are responsible for ensuring that retained records are included in business continuity and disaster recovery plans.

3. Procedure

- 3.1 The required retention periods, by record type, are recorded in the Retention Schedule under the following categories:
 - 3.1.1 Document/ Record produced
 - 3.1.2 Advised retention period
 - 3.1.3 Conditions/ Caveats
 - 3.1.4 Basis for decision
- 3.2 Each data asset that is stored is marked by the storing employee with the name of the record, the record type, the original owner of the data, the information classification, the method of storage, the required retention period, the planned date of destruction, and any other necessary information.
- 3.3 For all storage media (electronic and hard copy records), H Kemp and Son Limited retains the means to access that data.
- 3.4 For all electronic storage media, H Kemp and Son Limited does not exceed the manufacturer's recommended storage life. This is recorded in the Document Retention Schedule. When the maximum of the manufacturer's recommended storage life is reached, the stored data is copied onto new storage media.

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- 3.5 The Directors and the Asset Owner are responsible for destroying data once it has reached the end of the retention period as specified in Document Retention Schedule. Destruction must be completed within 30 days of the planned retention period. Destruction is handled in line with the specified procedures.
- 3.6 Portable/removable storage media are destroyed in line with specified procedures.

Document Owner and Approval

Eileen Kemp is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the General Data Protection Regulation.

A current version of this document is available to all members of staff in the GDPR Policy File and is included in the New Employee Starter Pack.

This procedure was approved by Eileen Kemp on 1st May 2018 and is issued on a version controlled basis under her signature.

Signature:

Date:

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue		
2			
3			

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Appendix A: Document retention schedule

Document/ Record produced	Advised retention period	Conditions/ Caveats	Basis for decision
Small Black Book data capture sheet	Permanently		Next of Kin contact details for Exhumation
Deceased Record Sheet (lge black book)	Permanently		Next of Kin contact details for Exhumation
Deceased Index Card	Permanently		Next of Kin contact details for Exhumation
Customer Accounts	6 Years		Debt Recovery Purposes
Customer Contacts	6 Years		Debt Recovery Purposes
Electronic Copy of Accounts	Permanently		Next of Kin contact details for Exhumation
Pre Paid Funeral Plan information	Indefinitely until used for funeral service		Plans live until plan holder deceased