

1. Purpose

1.1. The purpose of this policy is to detail the procedures for the retention and disposal of information held by CS Recycling, to ensure that the company carries out procedures consistently and responsible persons fully document any actions taken. Unless otherwise specified the retention and destruction policy refers to both hard and soft copy documents.

2. Review

2.1. Review is the examination of closed records to determine whether they should be destroyed, retained for a further period or transferred to an archive for permanent preservation.

3. How long CS Recycling and CS Shredding should keep our paper records

3.1. Records should be kept for as long as they are needed to meet the operational needs of the company, together with legal and regulatory requirements. Records have been assessed to:

- determine their value as a source of information about the company, its operations, relationships and environment,
- assess their importance as evidence of business activities and decisions
- establish whether there are any legal or regulatory retention requirements

(including: Public Records Act 1958, Data Protection Act 1988, the Freedom of Information Act 2000 and the Limitation Act 1980).

3.2. Where records are likely to have a historical value, or are worthy of permanent preservation, we will transfer them to the National Archives after 25 years.

4. Disposal schedule

4.1. A disposal schedule is a key document in the management of records and information. It is a list of series or collections of records for which predetermined periods of retention have been agreed between the Directors, Quality Manager and Data Protection Officer.

4.2. Records on disposal schedules will fall into three main categories:

1. Destroy after an agreed period – where the useful life of a series or collection of records can be easily predetermined (for example, destroy after 3 years; destroy 2 years after the end of the financial year).
2. Automatically select for permanent preservation – where certain groups of records can be readily defined as worthy of permanent preservation and transferred to an archive.
3. Review – see 2 above.

4.3. Records can be destroyed in the following ways:

Destruction

- Non-sensitive information/confidential information – shredded in industrial shredder located in facility
- Electronic equipment containing information - destroyed using reputable electronic equipment destruction facilitators. Individual folders will be permanently deleted from the system*

**Destruction of electronic records should render them non-recoverable even using forensic data recovery techniques.*

Archival transfer

4.4. This is the physical transfer of physical records to a permanent custody at the National Archives Office.

5. Sharing of information

5.1. Duplicate records should be destroyed. Where information has been regularly shared between business areas, only the original records should be retained in accordance with the guidelines in section 2 above. Care should be taken that seemingly duplicate records have not been annotated.

5.2. Where CS Recycling share information with other bodies, we will ensure that they have adequate procedures for records to ensure that the information is managed in accordance with the relevant legislation and regulatory guidance.

6. Audit trail

6.1. You do not need to document the disposal of records which have been listed on the records retention schedule. Documents disposed of outwith the schedule either by being disposed of earlier or kept for longer than listed will need to be recorded for audit purposes.

6.2. This will provide an audit trail for any inspections conducted by the Information Commissioner and will aid in addressing Freedom of Information requests, where we no longer hold the material.

7. Monitoring

7.1. Responsibility for monitoring the disposal policy rests with the Quality Manager and Data Protection Officer. The policy should be reviewed annually.

8. Retention timetable

Company	Document name/ type	Description	Retention timeframe
CS Recycling and CS Shredding	Waste Transfer Notes ("WTNs"), signed	<p>Documents containing the detailed information on the disposal of business or commercial waste.</p> <p>Data includes:</p> <ul style="list-style-type: none"> • SIC code • Description of waste • Company name • Company address • Contact name • Contact business email <p>CS Recycling hold signed WTNs for each of our customers.</p> <p>UK government overview here.</p>	2 years from document end date
CS Recycling	Completed collection tickets	<p>Documents containing details of collection jobs performed by CS Recycling, which are hand written.</p> <p>Data includes:</p> <ul style="list-style-type: none"> • Company name • Company address • SIC code • Description of waste • Contact business telephone <p>CS Recycling hold completed collection tickets for every collection.</p>	2 years from document date

Company	Document name/ type	Description	Retention timeframe
CS Shredding	Completed collection tickets	<p>Documents containing details of collection jobs performed by CS Shredding, which are hand written. These completed collection tickets are then scanned by 3rd party scanning provider, RPJ, on an annual basis who upload the scans to a password protected online cloud.</p> <p>Data includes:</p> <ul style="list-style-type: none"> • Company name • Company address • SIC code • Description of waste • Contact business telephone <p>CS Shredding hold completed collection tickets for every collection.</p>	<p>Hard copy: 2 years from document date</p> <p>Soft copy: 2 years from upload date</p>
CS Shredding	Collection schedule through outlook	<p>Drivers' scheduled collections. These are printed from Outlook and stored in hard copy in a locked cabinet.</p> <p>Data includes:</p> <ul style="list-style-type: none"> • Company/personal name • Company/personal address • Collection date • Collection type • Contact details (name and telephone) <p>CS Shredding have details for every collection.</p>	<p>Hard copy: Up to 2 years from collection date</p> <p>Soft copy: Up to 2 years</p>

Company	Document name/ type	Description	Retention timeframe
CS Recycling	Blank dustcart sheets	<p>Drivers' dustcart sheets with details on scheduled collections are created in Excel and stored in the T:/ Drive.</p> <p>Data includes:</p> <ul style="list-style-type: none"> • Company name • Company address • SIC code • Collection date • Collection type • Collection frequency • Contact details (name and telephone) <p>CS Recycling hold blank dustcart sheets for every dustcart round.</p>	3 years or customer lifetime (whichever is longer)
CS Recycling	Completed dustcart sheets	<p>Drivers' dustcart sheets with details on collection weight/amount, dated.</p> <p>Data includes:</p> <ul style="list-style-type: none"> • Company name • Company address • SIC code • Collection date • Collection type • Collection frequency • Contact details (name and telephone) <p>CS Recycling hold completed dustcart sheets for every dustcart round.</p>	3 – 5 years from document date

Company	Document name/ type	Description	Retention timeframe
CS Recycling	Signed equipment contracts	<p>Rolling contract containing details of equipment rentals to customers. These are stored for legitimate business needs.</p> <p>Data includes:</p> <ul style="list-style-type: none"> • Company name • Collection address • Invoice address • SIC code • Description of waste • Contact name <p>CS Recycling hold signed equipment contracts for every equipment rental customer.</p>	3 years or customer lifetime (whichever is longer)
CS Recycling and CS Shredding	Enquiry tracker	<p>Any inbound enquiries from prospective customers have their details stored in the excel spreadsheet named "CS Recycling + CS Shredding enquiries tracker Dec17"</p> <p>Data includes:</p> <ul style="list-style-type: none"> • Company name • Commercial Email Address • Commercial Location details • Personal Email Address • Personal Location Details 	2 years

Company	Document name/ type	Description	Retention timeframe
CS Recycling	Recruitment interface via Hiring People	<p>CS Recycling uses a flat fee recruiter "Hiring People" to post online job postings. This gives us access to the talent pool interface within the Hiring People website. The talent pool contains personal information.</p> <p>Data includes:</p> <ul style="list-style-type: none"> • Full name • Email address • Telephone number <p>The talent pool also includes a copy of the candidates CV, of which the data varies. The data may include:</p> <ul style="list-style-type: none"> • Personal address • Education history • Work history <p>All data held within the talent pool will not be used other than to contact the candidates for the purposes of recruitment.</p>	https://www.hiringpeople.co.uk/home/privacy-policy/
CS Recycling and CS Shredding	Recruitment	<p>All potential candidates who make it to the interview stage will have data stored in the company.</p> <p>Data includes:</p> <ul style="list-style-type: none"> • Full name • Email address • Telephone number <p>A copy of candidates CVs will also be retained by the company, which may include the following personal data:</p> <ul style="list-style-type: none"> • Personal address • Education history • Work history 	2 years
CS Recycling and CS Shredding	Emails in Outlook	Emails	2 years

Company	Document name/ type	Description	Retention timeframe
CS Recycling and CS Shredding	First aid form/accident book	<p>For purposes of health and safety, these forms must be held by the company and are a part of health and safety law requirements.</p> <p>Data held within these forms includes:</p> <ul style="list-style-type: none"> • Full name • Address • Occupation • Details of sickness 	<p>4 years</p> <p>http://www.hse.gov.uk/foi/busclasschem.pdf</p>
CS Recycling and CS Shredding	Health and Safety reporting	<p>For purposes of health and safety, there are records that must be held by the company and are a part of health and safety law requirements.</p> <p>Data held within these forms includes:</p> <ul style="list-style-type: none"> • Surname • Forename(s) • Gender • Date of birth • Permanent address, including post code • National Insurance number • Date present employment started • Recorded details of each health surveillance check should include: • The date they were carried out and by whom • The outcome of the test/check • The decision made by the occupational health professional in terms of fitness for task and any restrictions required. This should be factual and only relate to the employee's functional ability and fitness for specific work, with any advised restrictions. 	<p>4 years</p> <p>http://www.hse.gov.uk/foi/busclasschem.pdf</p>

Company	Document name/ type	Description	Retention timeframe
CS Recycling and CS Shredding	Payroll – BACS transfer report	<p>We hold personal information on everyone who receives payment from the company. These include suppliers and employees.</p> <p>Data held by the company includes:</p> <ul style="list-style-type: none"> • Full name • Company name • Banking details • Payslips • Supplier invoices 	3 years
CS Recycling and CS Shredding	Payroll – new employee form	<p>Information is held on employees of CS Recycling and CS Shredding. This is used for payment purposes.</p> <p>Data held in this system includes financial information, which includes:</p> <ul style="list-style-type: none"> • Banking details • Tax information • Withholdings • Salary • Benefits • Expenses • Allowances • Student loans 	The lifetime of employment + 3 years

CS Recycling and CS Shredding	People HR	<ul style="list-style-type: none"> • Full name • Home address • Occupation • Banking details • Payslips • Supplier invoices • Banking details • Tax information • Withholdings • Salary • Benefits • Expenses • Allowances • Student loans • Driving license • Accident forms • Working time • P45 • Training certificates • Disciplinary incidents • Payroll information including account information • Emergency contact details • NI number • Office location • Employment contract • Performance and disciplinary records • Grievance procedures • Sickness/holiday records • Spouse & dependents information • Marital status • Academic/professional qualifications • Criminal records data • References from previous employers • Racial/ethnic origin, Gender and Disabilities • Physical/Mental health 	Employee employment lifetime + 5 years
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Company	Document name/ type	Description	Retention timeframe
		<ul style="list-style-type: none"> CV 	
CS Recycling and CS Shredding	Customer labels	<p>Customer labels have information on our customer relating to the services agreed in verbal or written contracts with such customers. These are used in order to fulfil agreed services.</p> <p>Data includes:</p> <ul style="list-style-type: none"> Site contact name Company name Company address SIC code Contact business telephone 	Customer lifetime

Company	Document name/ type	Description	Retention timeframe
CS Recycling	CRM	<p>Collated details of all customers are held within one central location on the shared T:/ Drive. This is accessible by all CS Recycling and CS Shredding members of staff. The information is held to ensure an efficient service can be provided to customers.</p> <p>Data on customers includes:</p> <ul style="list-style-type: none"> • Company name • Company address • Company access times • CS Recycling/CS Shredding equipment held at site • Site contact full name • Site contact telephone • Site contact email • Other contact information • SIC code <p>CS Recycling conducts some jobs on behalf of a 3rd party waste management company. Details of these companies is also stored within the CRM.</p> <p>Data on 3rd party waste management companies includes:</p> <ul style="list-style-type: none"> • Company name • Company address • Contact full name • Contact telephone • Contact email 	Customer lifetime + 2 years

Company	Document name/ type	Description	Retention timeframe
CS Recycling and CS Shredding	Personnel folders	<p>For HR purposes, personal information is stored on each employee at CS Recycling and CS Shredding.</p> <p>The personal information stored includes:</p> <ul style="list-style-type: none"> • Driving license • Address • Telephone number • Accident forms • Working time • Infringements • P45 • Training certificates • Disciplinary incidents • Payroll information including account information 	Employee employment lifetime + 5 years
CS Recycling	Rebate prices list	<p>In order to ensure that we can keep track of rebate amounts to individual customers, a list has been formed which is stored on a local computer on site.</p> <p>Data on customers includes:</p> <ul style="list-style-type: none"> • Company name • Company address 	Customer lifetime + 2 years
CS Recycling and CS Shredding	Key suppliers list	<p>Data on suppliers includes:</p> <ul style="list-style-type: none"> • Company name • Company address • Contact full name • Contact business telephone • Contact business email • Other contact information 	