

Document Retention Policy 2024

1. Scope

All Hilton's Funeral Directors Limited's records, whether analogue or digital, are subject to the retention requirements of this procedure.

2. Responsibilities

1. 2.1 The following roles are responsible for retention of these records because they are the information asset owners.
2. 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.
3. 2.3 L. Hilton is responsible for retention of financial (accounting, tax) and related records.
4. 2.4 L. Hilton is responsible for retention of all HR records.
5. 2.5 L. Hilton is responsible for retention of all Health and Safety records.
6. 2.6 L. Hilton is responsible for retention of all other statutory and regulatory records.
7. 2.7 L. Hilton is responsible for storage of data in line with this procedure.
8. 2.8 L. Hilton is responsible for ensuring that retained records are included in business continuity and disaster recovery plans.

3. Procedure

1. 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
2. 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. 3.3 For all storage media (electronic and hard copy records), Hiltons Funeral Directors Limited retains the means to access that data.
4. 3.4 For all electronic storage media, Hilton Funeral Directors 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.
5. 3.5 The managing director 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.

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3.6 Portable/removable storage media are destroyed in line with specified procedures. Document Owner and Approval

Louris Hilton 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.

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Appendix A: Document retention

Document/ Record produced

Advised retention period

Conditions/ Caveats

Basis for decision

First call sheet Funeral arrangement form Account Invoice Jewellery and cremated remains release slips (Paper Based)	N/A	Retained only in funeral home offices for a maximum of two years	Documents must be kept for reference purposes, unpaid funeral accounts. Once two-year period is up, paper documents are shredded
First call sheet Funeral arrangement form Account Invoice Jewellery and cremated remains release slips (Digitally Scanned)	N/A	Retained permanently on secure business server for future business needs including protection against litigation and customer complaint resolution.	Documents to be held permanently for future reference by family members who may wish to view funeral records.

Contracts

Throughout the contract period and 6 years afterwards

7 years from end of financial year.

The start date of the retention period is the date of execution of the agreement.

Section 5 Limitation Act 1980

Insurance Policies, including but not limited to the following: public liability policies, product liability policies, employers liability policies, insurance schedules, group health policies, group personal accident policies, personal claims policies	Indefinite retention period treat as permanent.	Employers Liability regulations 1998 call for a minimum of 40 years from start of insurance period.	Employers Liability (Compulsory Insurance) Regulations 1998 Limitations Act 1980
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Company accounts, management accounts, and expenses

Companies Act 2006 Finance Act 1998 VAT Act 1994

- Annual return of taxable pay & tax paid 6 years from end of employment

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Appendix B: Disposal considerations and guidance

Each of the following questions and related guidance should be considered prior to the disposal of any document.

1. Has the document been checked for type of document, recommended retention timescales in line with the schedules in this document and checked for confidentiality?

Check that the nature and contents of the document are suitable for disposal

2. Is retention required to fulfil statutory obligations or other regulatory obligations?

Specific legislation setting out mandatory retention periods for documentation held by Trevor E W Hickton Limited is limited but includes:

- The GDPR provides that data must be held for no longer than is necessary for the purposes for which the personal data is processed
- Standard contract law stands for 6 years following completion under the contract under the Limitations Act

Refer to the attached document retention schedules for relevant guidance

3. Is retention required for evidence?

Is there an outstanding insurance claim, pending legal action or the likelihood of either?

4. Is there a current business requirement or Subject Access Request (SAR) that needs this information?

5. Is retention required to meet any operational or business needs?

6. How is the document to be disposed of?

Ensure appropriate destruction certificates if applicable.