



Data Retention Policy

Data Retention Policy

Purpose

The purpose of this policy is to ensure that Xander Recruitment Ltd manages, retains and disposes of information in a consistent, secure and legally compliant manner. This policy supports compliance with UK data protection legislation and other applicable legal and contractual obligations.

Scope

This policy applies to all employees, temporary workers, contractors and anyone handling information on behalf of Xander Recruitment Ltd.

It applies to all information held by the company, including:

- Employee records
- Candidate records
- Client records
- Financial records
- Health and safety records
- Company policies and procedures
- Emails
- Electronic files
- Paper records

Policy Statement

Xander Recruitment Ltd will:

- Retain information only for as long as there is a legitimate business, contractual or legal reason.
- Ensure information remains accurate, secure and accessible throughout its retention period.
- Securely dispose of information once the retention period has expired unless a legal requirement dictates otherwise.
- Protect confidential and personal information against unauthorised access, alteration or destruction.

Responsibilities

Managing Director

The Managing Director is responsible for ensuring adequate resources are available to implement this policy.

Compliance Officer

The Compliance Officer is responsible for:

- Maintaining the Data Retention Schedule.
- Monitoring compliance.
- Reviewing this policy annually.
- Coordinating the secure disposal of records.

Employees

All employees are responsible for following this policy and reporting any concerns relating to records management or data retention.



Data Retention Policy

Storage of Records

Records may be held electronically or in paper format.

Electronic records shall:

- Be stored on secure company systems.
- Be protected by appropriate passwords and access controls.
- Be backed up in accordance with company procedures.

Paper records shall:

- Be stored securely.
- Be accessible only to authorised personnel.
- Be protected from damage, loss or unauthorised disclosure.

Disposal of Records

When records reach the end of their retention period, they shall be disposed of securely.

Examples include:

- Confidential shredding of paper documents.
- Permanent deletion of electronic files.
- Secure destruction of storage media where appropriate.

No records shall be destroyed where they are subject to:

- Ongoing litigation.
- Insurance claims.
- Regulatory investigation.
- Internal investigation.
- Contractual dispute.

Data Retention Schedule

Record Type	Minimum Retention Period
Company Policies and Procedures	Current version plus superseded versions retained for 3 years
Internal Audit Reports	3 years
Management Review Records	3 years
Corrective Action Records	3 years
Non-Conformance Records	3 years
Risk Assessments	Current version plus 3 years after replacement
Training Records	Duration of employment plus 6 years
Personnel Files	6 years after employment ends
Payroll Records	6 years
Candidate Placement Records	6 years after placement where applicable
Client Contracts	6 years after expiry
Financial Records	6 years plus the current financial year
Accident Records	Minimum 3 years (or longer where legislation requires)



Data Retention Policy

RIDDOR Records

Minimum 3 years

Data Protection

All personal information shall be processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Personal information shall only be retained where:

- Required by law.
- Required by contract.
- Required for legitimate business purposes.
- Consent has been obtained where appropriate.

Review

This policy shall be reviewed annually, or sooner if:

- Legislation changes.
- Business requirements change.
- Audit findings identify improvements.
- Significant incidents occur.

Alex Stockley – Managing Director – XANDER RECRUITMENT GROUP LTD

Date: September 2026

Review Date: September 2027