

Employment Data Retention Policy

This policy sets out how long employment-related information will normally be held by the Company and when that information will be confidentially destroyed.

1 Responsibility

- 1.1 the data protection officer is responsible for implementing and monitoring compliance with this policy.
- 1.2 They will undertake a regular review of this policy to verify that it is in effective operation.

2 Our process

- 2.1 Information (hard copy and electronic) will be retained for at least the period specified in our Data Retention Schedule (see Appendix).
- 2.2 All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.
- 2.3 Hard copy and electronically-held documents and information must be deleted at the end of the retention period.
- 2.4 Hard copy documents and information must be disposed of by the Company's waste and recycling provider, or alternatively disposed of through cross-cut shredders.

Appendix

GDPR Data Retention Schedule

This Data Retention Schedule accompanies and is incorporated into the Company's Employment Data Retention Policy. It sets out the time periods that different types of employment-related business records must be retained for business and legal purposes. This lists the main types of employment-related records used by the Company and the applicable retention periods for each record type.

The retention periods are based on business needs and legal requirements. If you maintain any types of records that are not listed in this Schedule, and it is not clear from the existing record types in this Schedule what retention period should apply, please contact the data protection officer for guidance.

Any deviation from the retention periods in this Schedule must be approved in advance by the data protection officer.

Type of employment record	Format and location	Retention period or recommendation
Job applications and interview records of successful and unsuccessful candidates	Paper or electronic	Unsuccessful candidates - 6 months after notifying unsuccessful candidates Successful candidates - six years after employment ceases
Personnel and training records (including performance, conduct and sickness absence records)	Paper or electronic	While employment continues and up to six years after employment ceases
Written particulars of employment, contracts of employment, and changes to terms and conditions	Paper or electronic	While employment continues and up to six years after employment ceases
Working time opt-out forms	Paper or electronic, originals are not required by the WTR 1998	Two years from the date on which they were entered into
Records to show compliance with the WTR 1998	Paper or electronic	Two years after the relevant period
Annual leave records	Paper or electronic	Six years -longer if leave is carried over from year to year
Payroll and wage/benefit records	Paper or electronic	Six years
Payroll and wage records for companies for tax and compliance purposes (including income tax and NI returns, records and HMRC correspondence)	Paper or electronic	Not less than three years after the end of the tax year to which they relate. However it may be sensible to keep them for six years as they may fall within the definition of payroll and wage records (see above)
Collective workforce agreements and past agreements that could affect present employees	Paper or electronic	Permanently
Works Council minutes	Paper or electronic	Permanently
Parental leave records	Paper or electronic	Three years after the end of the tax year in which the maternity pay period ends
Sickness records required for the purposes of SSP	Paper or electronic	Three years after the end of the tax year in which payments are made
Current bank details	Paper or electronic	No longer than necessary

Record of advances for season tickets and loans to employees	Paper or electronic	While employment continues and up to six years after repayment
Death Benefit Nomination and Revocation Forms	Paper or electronic	While employment continues or up to six years after payment of benefit
Records of any reportable accident, death or injury in connection with work	Paper or electronic	Three years beginning with the date of the entry (or if involves a child or young adult until that person reaches the age of 21)
Consents for the processing of personal and sensitive data	Paper or electronic	For as long as the data is being processed and up to 6 years afterwards
Immigration checks and copies of identification documents	Paper or electronic	Two years after the termination of employment
Records concerning a temporary worker	Paper or electronic	6 years after employment ceases
Redundancy records	Paper or electronic	6 years from the date of redundancy
Pension Scheme Investment Policies and Pensioners' records	Paper or electronic	12 years from the ending of any benefit payable under the policy
Records required under The Control of Substances Hazardous to Health Regulations 2002 including: <ul style="list-style-type: none"> • Medical records • Records of monitoring hazardous substances • Records of tests and examinations of control systems and protective equipment 	Paper or electronic	<p>Medical records - 40 from the date of the last entry made in the record</p> <p>Records of monitoring hazardous substances:</p> <p>(i) personal exposures of identifiable employees - 40 years from the date of the last entry made in the record</p> <p>(ii) otherwise - 5 years from the date of the last entry made in the record</p> <p>Control systems and protective equipment - Five years from the date on which the record was made</p>