

As a consultancy business we hold data not only on our clients, but potentially on their employees too to allow us to give relevant advice. This data may include spreadsheets of information if we are creating new contracts of employment or assisting with pay review modelling or redundancies for example. We may also hold information provided to allow us to give advice in relation to sickness absence, performance and disciplinary matters. We would hope that all our clients past and present have implemented the standards defined in the GDPR and have informed their employees accordingly regarding third party access to their data. With this in mind, below is a table of the data we hold, the reasons why and how long we hold it for. If you have any concerns, please contact e-mail me at julia@hrall.co.uk.

Type of employee personal Data	Details of employee personal Data	Data retention period	Business case/need for data retention	Method of data deletion
DATA THAT MAY BE HELD BY THE COMPANY AS CONTROLLER IN EMPLOYEE DOCUMENTS / FILE NOTES ON OUR HR SOFTWARE SYSTEM/ON E-MAIL, ON COMPUTER FILES OR ELSEWHERE, INCLUDING ON PAPER				
Recruitment data	Job offers - not accepted	6 months from the date of offer or rejection, except if any claim is made within that time, in which case the claimant's data will be held until completion of the claim.	A candidate may make a discrimination claim during or after the selection process. Information may therefore be required to defend a claim.	Automated system deletion 6 months after the date of offer or rejection, except if any claim is made within that time, or notification received of an ongoing dispute, in which case the claimant's data will be deleted on completion of the claim.
Contact / Personal data	Personal home and work contact details Emergency Contact details of next of kin Employee Photo	While employment continues and for 12 months from the date employment ceases, except if any claim is made within that time in which case the claimant's data will be held until completion of the claim.	To allow for contact to be made in the first year after employment ends to deal with any immediate issues arising.	Automated system deletion 12 months after termination date, except if any claim is made within that time, or notification received of an ongoing dispute, in which case the claimant's data will be held until completion of the claim.

<p>General Employment Contract data</p>	<p>Contract data including details of role, reporting structure, job location, holiday entitlement, notice period, working hours, and amendment to contract letters Probation data Overtime and TOIL data Lateness data Annual leave data Family leave data Privacy notices and data processing consent records Working time data</p>	<p>While employment continues and for 6 years after the last day of the last complete tax year during which they worked, except if any claim is made within that time, in which case the claimant's data will be held until completion of the claim.</p>	<p>As there is the possibility that any documents relating to an employee could be relevant to a tribunal, County Court or High Court claim, we are following current ICO guidance to keep employee files for 6 years following the end of employment.</p>	<p>Automated system deletion 6 years after the last day of the last complete tax year during which they worked, unless any claim is still outstanding in which case the claimant's data will be deleted on completion of the claim.</p>
<p>Performance and Training data</p>	<p>Absence data Appraisal data Probation data Qualification and skills data Training data Employee of the month and Good Job data</p>	<p>While employment continues and for 6 years after the last day of the last complete tax year during which they worked, except if any claim is made within that time, in which case the claimant's data will be held until completion of the claim.</p>	<p>As there is the possibility that any documents relating to an employee could be relevant to a tribunal, County Court or High Court claim, we are following current ICO guidance to keep employee files for 6 years following the end of employment.</p>	<p>Automated system deletion 6 years after the last day of the last complete tax year during which they worked, unless any claim is still outstanding in which case the claimant's data will be deleted on completion of the claim.</p>

Pay and Benefits data	Payroll and tax data Date of birth Gender Loan data Advancements and deductions from wages data Court Orders data Statutory Pay data Bank Account details Expenses records Pension data Benefit schemes data	While employment continues and for 6 years after the last day of the last complete tax year during which they worked, except if any claim still outstanding, in which case the claimant's data will be held until completion of the claim.	Statutory retention period under the Taxes Management Act 1970 of 6 years after the last day of the last complete tax year during which they worked.	Automated system deletion 6 years after the last day of the last complete tax year during which they worked, unless any claim still outstanding in which case the claimant's data will be deleted on completion of the claim.
Leavers data (not covered elsewhere)	Leaver's report	6 years after the last day of the last complete tax year during which they worked, except if any claim is made within that time, in which case the claimant's data will be held until completion of the claim.	As there is the possibility that any documents relating to an employee could be relevant to a tribunal, County Court or High Court claim, we are following current ICO guidance to keep employee files for 6 years following the end of employment.	Automated system deletion 6 years after the last day of the last complete tax year during which they worked, unless any claim is still outstanding in which case the claimant's data will be deleted on completion of the claim.
Health and Safety data	Data on any reportable accident, death or injury in connection with work	While employment continues and for 6 years after the last day of the last complete tax year during which they worked, except if any claim is made within that time, in which case the claimant's data will be held until completion of the claim.	As there is the possibility that any documents relating to an employee could be relevant to a tribunal, County Court or High Court claim, we are following current ICO guidance to keep employee files for 6 years following the end of employment.	Automated system deletion 6 years after the last day of the last complete tax year during which they worked, unless any claim is still outstanding in which case the claimant's data will be deleted on completion of the claim.

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<p>Recruitment documents</p>	<p>CVs of rejected applicants CVs of applicants offered jobs but not accepted References provided by third parties for job offers whether accepted or not</p>	<p>6 months from the date of offer or rejection, except if any claim is made within that time, in which case the claimant's data will be held until completion of the claim.</p>	<p>A candidate may make a discrimination claim during or after the selection process. Information may therefore be required to defend a claim.</p>	<p>Automated system deletion 6 months after the date of offer or rejection, except if any claim is made within that time, or notification received of an ongoing dispute, in which case the claimant's data will be deleted on completion of the claim.</p>
<p>General Employment Contract documents</p>	<p>CVs of current employees if we have assisted with recruitment Application forms of current employees Employment Contracts Probation records</p>	<p>While employment continues and for 6 years after the last day of the last complete tax year during which they worked, except if any claim is made within that time, in which case the claimant's data will be held until completion of the claim.</p>	<p>As there is the possibility that any documents relating to an employee could be relevant to a tribunal, County Court or High Court claim, we are following current ICO guidance to keep employee files for 6 years following the end of employment.</p>	<p>Automated system deletion 6 years after the last day of the last complete tax year during which they worked, unless any claim is still outstanding in which case the claimant's data will be deleted on completion of the claim.</p>

<p>Performance and Training records</p>	<p>Disciplinary records Grievance records Capability / Poor Performance records Appraisal / Performance records Probation records Absence Management records Family Leave records Training agreements Qualification and skills documents, including professional certificates and driving licence copies Redundancy consultations</p>	<p>While employment continues and for 6 years after the last day of the last complete tax year during which they worked, except if any claim is made within that time, in which case the claimant's data will be held until completion of the claim.</p>	<p>As there is the possibility that any documents relating to an employee could be relevant to a tribunal, County Court or High Court claim, we are following current ICO guidance to keep employee files for 6 years following the end of employment.</p>	<p>Automated system deletion 6 years after the last day of the last complete tax year during which they worked, unless any claim is still outstanding in which case the claimant's data will be deleted on completion of the claim.</p>
<p>Pay and Benefits records</p>	<p>HMRC records Loan agreements Court Order records Statutory Pay records Bank Account details Expenses records Pension records Benefit schemes records</p>	<p>While employment continues and for 6 years after the last day of the last complete tax year during which they worked, except if any claim made within that time, in which case the claimant's data will be held until completion of the claim.</p>	<p>Statutory retention period under the Taxes Management Act 1970 of 6 years after the last day of the last complete tax year during which they worked.</p>	<p>Automated system deletion 6 years after the last day of the last complete tax year during which they worked, unless any claim still outstanding in which case the claimant's data will be deleted on completion of the claim</p>

Leavers records (not covered elsewhere)	Exit interviews Redundancy records	6 years after the last day of the last complete tax year during which they worked, except if any claim is made within that time, in which case the claimant's data will be held until completion of the claim.	As there is the possibility that any documents relating to an employee could be relevant to a tribunal, County Court or High Court claim, we are following current ICO guidance to keep employee files for 6 years following the end of employment.	Automated system deletion 6 years after the last day of the last complete tax year during which they worked, unless any claim is still outstanding in which case the claimant's data will be deleted on completion of the claim.
Health and Safety records	Records of any reportable accident, death or injury in connection with work	While employment continues and for 6 years after the last day of the last complete tax year during which they worked, except if any claim is made within that time, in which case the claimant's data will be held until completion of the claim.	As there is the possibility that any documents relating to an employee could be relevant to a tribunal, County Court or High Court claim, we are following current ICO guidance to keep employee files for 6 years following the end of employment.	Automated system deletion 6 years after the last day of the last complete tax year during which they worked, unless any claim is still outstanding in which case the claimant's data will be deleted on completion of the claim.
Immigration checks	Identification records Details of right to work in UK including any work permit	Whilst employment continues and for 2 years after the termination date of employment.	Legal obligation based on Home Office guidance issued under Immigration, Asylum and Nationality Act 2006, to retain copies of right to work documents during employment and for 2 years after they stop working for you.	Automated deletion two years after the last day of employment

<p>Criminal convictions records</p>	<p>Disclosure and Barring Service (DBS) checks pre-recruitment Disclosures of criminal records during employment DBS periodic updates</p>	<p>1A. Pre-recruitment checks for job offers not accepted or withdrawn will be deleted 3 months after offer date, except if any claim is made within that time, or notification received of an ongoing dispute, in which case the claimant's data will be deleted on completion of the claim.</p> <p>1B. Pre-recruitment checks for current employees will be deleted in accordance with the General Employment Contract Documents retention period above.</p> <p>2. Where DBS check or disclosure during employment is necessary for the purposes of carrying out employment rights and obligations, it will need to be kept during employment and will need to be regularly updated, and any update will replace the previous DBS check which should then be deleted.</p> <p>3. On termination of employment, a current DBS check or disclosure during employment will be held for 6 years after the last day of the last complete tax year during which they worked, except if any claim is made within that</p>	<p>1. Pre-recruitment checks or disclosures during employment need to be carried out or held if the employee is dealing with large amounts of sensitive data, or if otherwise necessary for the purposes of carrying out employment rights and obligations. These checks or disclosures may be a document relevant to any tribunal, County Court or High Court claim, and therefore to be retained for up to 6 years after termination of employment.</p> <p>2. Where replacement DBS checks are provided on a regular basis, the old check will be kept on the system whilst it is established whether any potential claim for which the DBS check may be relevant will be made in relation to that previous period.</p>	<p>Pre-recruitment checks for job offers not accepted or withdrawn - manual deletion 3 months after offer date, except if any claim is made within that time, or notification received of an ongoing dispute, in which case the claimant's data will be deleted on completion of the claim.</p> <p>Where DBS check is necessary for the purposes of carrying out employment rights and obligations an old DBS check will be deleted 12 months after storing of new updated DBS check unless any claim is still outstanding, in which case the claimant's data will be deleted upon completion of the claim.</p> <p>Where DBS check or disclosure during employment is necessary for the purposes of carrying out employment rights and obligations, a current DBS check or disclosure during employment will be automatically deleted 6 years after the last day of the last complete tax year during which they worked, unless any claim is still outstanding in which case the claimant's data will be deleted on completion of the claim.</p>
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File Notes	Any Data included in File Notes	While employment continues and for 6 years after the last day of the last complete tax year during which they worked, except if any claim is made within that time, in which case the claimant's data will be held until completion of the claim.	As there is the possibility that any documents relating to an employee could be relevant to a tribunal, County Court or High Court claim, we are following current ICO guidance to keep employee files for 6 years following the end of employment.	Automated system deletion 6 years after the last day of the last complete tax year during which they worked, unless any claim is still outstanding in which case the claimant's data will be deleted on completion of the claim.
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