

## Data Retention Policy – Internal Employee Records

Company Name:	Gi Group Holdings Recruitment Limited
Document DP9:	Retention Policy
Topic:	Data protection
Date:	20 November 2023
Version:	3 (November 2023)

### 1 Introduction

1.1 This policy sets out how long employment/recruitment-related information will normally be held by us and when that information will be confidentially destroyed.

### 2 Responsibility

2.1 Data Protection Officer is responsible for implementing and monitoring compliance with this policy.

2.2 They will undertake an annual review of this policy to verify that it is in effective operation.

### 3 Our process

3.1 Information (hard copy and electronic) will be retained for the period specified in our Records Retention Schedule.

3.2 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.

3.3 Hard copy and electronically held documents and information must be deleted at the end of the retention period, unless there is a requirement to delay deletion (as per paragraph 3.2)

3.4 Hard copy documents and information must be disposed of by shredding, placing in confidential waste bins.

### Records Retention Schedule

This Record Retention Schedule sets out the time periods that different types of records must be retained for business and legal purposes.

The retention periods are based on business needs and legal requirements and should be read in accordance with Gi Group's data protection policy. If you maintain any types of records that are not listed in this schedule and it is not clear what retention period should apply, please contact the Data Protection Officer for guidance.

Any deviance from the retention periods in this schedule must be approved in advance by a Director.

This policy will address internal employment records.

Internal employee/applicants for internal roles

Record	Applicable Gi Documents	Retention Period	Storage Format
Rejected job applicant records, including:	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• CV/Applications</li> <li>• References</li> <li>• Skills &amp; Test results</li> <li>• Interview notes</li> </ul>	<p>12 months after applicant is notified of rejection.</p> <p>All data recorded outside of iCIMS systems should be deleted 12 months after applicant is notified of rejection.</p>	Paper or electronic
Application records of successful candidates, including:	<ul style="list-style-type: none"> <li>• CV/Applications</li> <li>• References</li> <li>• Training and qualification certificates</li> <li>• Correspondence concerning employment</li> <li>• Skills &amp; Test result</li> <li>• Interview notes</li> </ul>	6 years after employment ceases	Paper or electronic
Employment contracts including:	<ul style="list-style-type: none"> <li>• Personnel and Training records</li> <li>• Written particulars of employment</li> <li>• Changes to terms and conditions</li> </ul>	6 years after employment ceases	Paper or electronic
Employee performance and conduct records:	<ul style="list-style-type: none"> <li>• Probationary reviews</li> <li>• Review and appraisal notes</li> <li>• Promotions/demotions</li> <li>• Disciplinary records</li> <li>• Grievance records</li> </ul>	6 years after employment ceases	Paper or electronic
Other employment records	<ul style="list-style-type: none"> <li>• Redundancy records</li> <li>• Annual leave records</li> <li>• Maternity leave records including MATB1</li> <li>• Parental leave records</li> <li>• Adoption leave records</li> <li>• Sickness records</li> <li>• Return to work meetings</li> </ul>	6 years after employment ceases	Paper or electronic

Record	Applicable Gi Documents	Retention Period	Storage Format
Directors' service contracts and any variations	A Director's Service Agreement lays out clearly the directors' responsibilities and benefits. This is like an employment contract but goes a little further in what it covers.	6 years after employment ceases  if document executed as a deed- this should be 13 years after employment ceases	Paper or electronic
Copies of identification documents/right to work	To cover all documents under government regulations that gives the right to work in the UK.	6 years from date of termination of employment	Paper or electronic
Records relating to/demonstrating compliance with Working Time Regulations 1998:	<ul style="list-style-type: none"> <li>• Tacho records</li> <li>• 48hr opt out forms</li> <li>• Employee working time records</li> <li>• Overtime</li> <li>• Annual Leave</li> <li>• Time off for dependants</li> </ul>	Current payroll plus 2 years from the date on which the record was made	Paper or electronic
Criminal records information & checks	<ul style="list-style-type: none"> <li>• DBS application forms</li> <li>• DBS certificates</li> </ul>	6 months	Paper or electronic
Gender pay gap reporting information	Supporting evidence: <ul style="list-style-type: none"> <li>• Documentation</li> <li>• Information</li> <li>• Full report</li> </ul>	3 years beginning with the date of publication	Paper or electronic
Flexible working requests	Supporting evidence: <ul style="list-style-type: none"> <li>• FWR Forms</li> <li>• Emails</li> <li>• Information &amp; documentation</li> </ul>	18 months from request	Paper or electronic
Whistleblowing	To include: <ul style="list-style-type: none"> <li>• Investigation notes</li> <li>• Statements</li> <li>• Minutes</li> <li>• Letters</li> <li>• Emails</li> </ul>	6 months following the outcome (if a substantiated investigation). If unsubstantiated, personal data should be removed immediately.	Paper or electronic
Subject Access Requests		12 months following the completion of the request	Paper or electronic
Equality & Diversity	Reports and Information Forms	Current payroll year plus 2 years.	Paper or electronic