

Data Retention Policy

The Company will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, tax, health and safety, reporting or accounting requirements.

The Company will generally hold your personal information for the duration of your employment or engagement. The exceptions are:

- any personal information supplied as part of the recruitment process will not be retained if it has no bearing on the ongoing working relationship;
- personal information about criminal convictions and offences collected in the course of the recruitment process will be deleted once it has been verified through a DBS criminal record check, unless the information has been assessed by the Company as relevant to the ongoing working relationship;
- if it has been assessed as relevant to the ongoing working relationship, a DBS criminal record check will nevertheless be deleted within six months of leaving our employment information about spent convictions may be retained because the role is an excluded occupation.
- disciplinary, grievance and capability records will only be retained until twelve months after the expiry of any warning given (but a summary disciplinary, grievance or performance management record will still be maintained for the duration of your employment).

Once you have left employment or your engagement has been terminated, we will generally hold your personal information for one year after the termination of your employment or engagement, but this is subject to:

(a) any minimum statutory or other legal, tax, health and safety, reporting or accounting requirements for particular data or records,

and

(b) the retention of some types of personal information for up to six years to protect against legal risk, e.g. if they could be relevant to a possible legal claim in a tribunal, County Court or High Court.

We will hold payroll, wage and tax records (including salary, bonuses, overtime, expenses, benefits and pension information, National Insurance number, PAYE records, tax code and tax status information) for six years after the termination of your employment or engagement. Overall, this means that we will “thin” the file of personal information that we hold on you one year after the termination of your employment or engagement, so that we only continue to retain for a longer period what data is strictly necessary.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable. In some circumstances we may anonymise your personal information so that it no longer permits your identification. In this case, we may retain such information for a longer period.