

Johnson Underwood Retention Policy (GDPR)

As with all businesses, Johnson Underwood must keep personal and financial records in order to run its business efficiently and to comply with statutory requirements. The type of record will determine the length of time the record must be kept for.

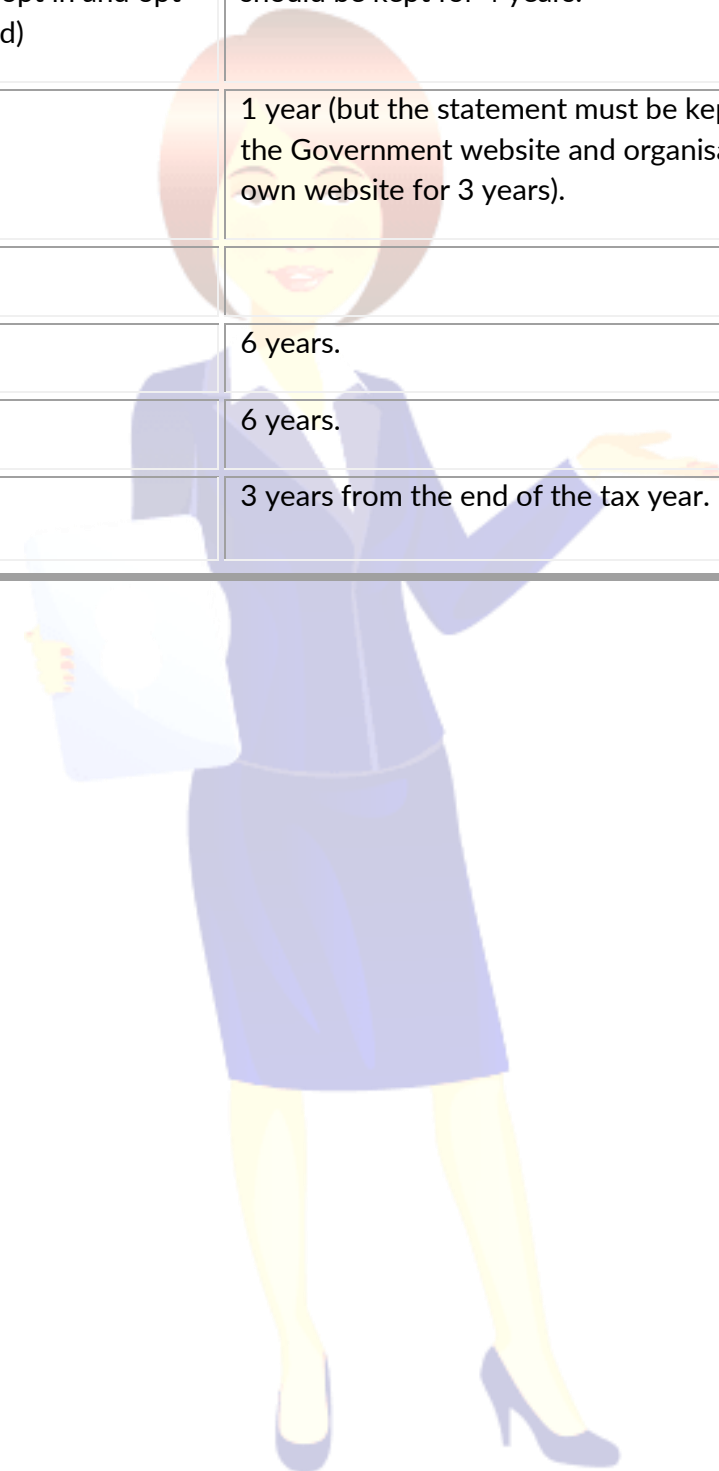
All records will be kept in accordance with The Data Protection Laws. We are required to store records in writing, including electronic format.

When erasing or destroying records, destruction will be undertaken in a secure manner.

| Document Type | How long to keep for (and source of requirement if applicable) |
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| Personnel Records | |
| <ul style="list-style-type: none"> Work-seeker records including application form/CV, ID checks, terms of engagement, details of assignments, opt-out notices and interview notes Hirer records including client details, terms of business, assignment/vacancy details. | 1 year from the last date of providing work-finding services as an Employment Agency or Employment Business (Conduct of Employment Agencies and Employment Businesses Regulations 2003 (Conduct Regulations)). |
| Terms of Engagement with Temporary Worker employed on contract/assignment and terms of business with clients | 6 years in order to deal with any civil action in the form of contractual claim (Limitation Act 1980). |
| Working Time Records: <ul style="list-style-type: none"> 48 hour opt out notice Annual leave records | 2 years from the time they were created. |
| Annual Appraisal/ Assessment Records | No specific period – under data protection laws these should be kept for as long as is necessary. |
| References | Under data protection laws, we will keep records only for as long as is necessary. However, the Conduct Regulations (see above) require references to be kept for 1 |

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| | year following the introduction or supply of a work-seeker to a client. |
| Records held relating to right to work in the UK | 2 years after employment or engagement has ended. |
| Criminal records checks/Disclosure Barring checks | <p>There is no longer a 6 month time limit on how long DBS certificates can be kept. When it comes to handling and storing certificates the new DBS Code requires registered bodies to 'handle all information provided to them by DBS, as a consequence of applying for a DBS product, in line with the obligations under Data Protection Act 1998'.</p> <p>The registered body we use is uCheck (https://www.ucheck.co.uk)</p> |
| <p>National Minimum Wage documentation:</p> <ul style="list-style-type: none"> • Total pay by the worker and the hours worked by the worker • Overtime/shift premia; • Any deduction or payment of accommodation; • Any absences e.g. rest breaks, sick leave, holiday; • Any travel or training during working hours and its length; • Total number of hours in a pay reference period | <p>For HMRC purposes: 3 years after the end of the pay reference period following the one that the records cover (National Minimum Wage Act 1998).</p> <p>Or 6 years in order to show that you have paid at least National Minimum Wage rates.</p> |
| Sickness Records – Statutory Sick Pay | Records can be kept in a flexible manner which best suits our business but should be kept for payroll purposes (see below). |
| Statutory Maternity, Paternity, Adoption pay | 3 years from the end of the tax year to which it relates. |

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| Pensions auto-enrolment (including auto-enrolment date, joining date, opt in and opt out notices, contributions paid) | 6 years except for opt out notices which should be kept for 4 years. |
| Gender pay gap reporting (250 employees) | 1 year (but the statement must be kept on the Government website and organisation's own website for 3 years). |
| Company Financial Records | |
| VAT | 6 years. |
| Company Accounts | 6 years. |
| <ul style="list-style-type: none"> • Payroll information • CIS records | 3 years from the end of the tax year. |





Accounting and Finance | Commercial and Office
Legal and Executive | Sales and Marketing | Human Resources
Engineering | Technical and IT | Ancillary and Support Staff
Public Sector and Education