



JGA Recruitment Group Ltd - Data Retention Policy

1. Purpose

This Data Retention Policy sets out how personal data is managed, retained, and securely disposed of by JGA Recruitment Group Ltd in accordance with the requirements of the Information Commissioner's Office (ICO) and applicable UK data protection legislation, including the UK GDPR and Data Protection Act 2018.

The purpose of this policy is to:

- Ensure personal data is not kept longer than necessary
- Define clear retention periods for different categories of data
- Promote secure disposal practices
- Demonstrate accountability and compliance

2. Scope

This policy applies to:

- All personal data processed by the organisation
- All employees, contractors, and third parties handling personal data
- All systems, both digital and paper-based

3. Principles of Data Retention

The organisation adheres to the following principles:

- Personal data shall be retained only for as long as necessary
- Retention periods are based on legal, regulatory, and business needs
- Data will be securely deleted or anonymised when no longer required
- Regular reviews of retained data will be conducted

4. Roles and Responsibilities

- Data Controller / Management: Ensures compliance with this policy
- Employees: Follow retention and disposal procedures

5. Data Retention Schedule

The following table outlines the organisation's data retention schedule, specifying the types of personal data held, the lawful basis for processing, and the corresponding retention and disposal requirements.

Data Retention Schedule

Data Category	Examples of Personal Data	Lawful Basis	Retention Period	Disposal Method
Candidate records (unsuccessful)	CVs, application forms, interview notes, assessment results	Legitimate interests	12 months from last contact	Secure deletion / confidential shredding



Candidate records (placed / engaged)	CVs, contracts, compliance checks, placement records	Contract / legal obligation	6 years from end of engagement	Secure deletion
Right-to-work checks	ID documents, visas, share codes	Legal obligation	2 years after employment ends	Secure deletion
Employee personnel files	Contracts, appraisals, disciplinary records	Contract / legal obligation	6 years after employment ends	Secure deletion
Payroll and tax records	PAYE, NI, salary, pension records	Legal obligation	6 years after tax year end	Secure deletion
Equality & diversity data	Gender, ethnicity, disability (monitoring only)	Consent / substantial public interest	12 months (anonymised where possible)	Secure deletion / anonymisation
Medical / health data	Fit notes, occupational health reports	Legal obligation employment law	6 years after employment ends	Secure deletion
Criminal records (DBS)	Disclosure outcomes (no certificates retained)	Legal obligation	Decision recorded only; certificate not retained	N/A
Client contact data	Names, job titles, contact details	Legitimate interests / contract	Duration of relationship + 6 years	Secure deletion
Supplier contact data	Names, contact details	Legitimate interests / contract	Duration of relationship + 6 years	Secure deletion
Marketing mailing lists	Email addresses, preferences	Consent / legitimate interests	Until consent withdrawn or opt-out	Secure deletion
Website enquiries	Enquiry forms, correspondence	Legitimate interests	12 months from last contact	Secure deletion
CCTV (if applicable)	Images of individuals	Legitimate interests	30 days unless required for investigation	Secure deletion
Complaints and SAR records	Correspondence, identity verification	Legal obligation	3 years after closure	Secure deletion



6. Data Disposal Procedures

When data reaches the end of its retention period, it must be:

- Permanently deleted from IT systems
- Removed from backups where feasible
- Shredded if held in paper format
- Anonymised where statistical retention is required

All disposal must be secure and irreversible.

7. Exceptions

Data may be retained beyond stated periods where:

- Required for legal claims or disputes
- Subject to regulatory investigations
- Needed to comply with legal obligations

Such retention must be documented and justified.

8. Review and Monitoring

- This policy will be reviewed annually or upon regulatory change

9. Related Policies

- Data Protection Policy
- Privacy Policy
- Information Security Policy

JGA Recruitment Group Ltd, Suite 4, 1 Lea Business Park, Lower Luton Road, Harpenden AL5 5EQ Tel: 01727 800377
Registered Office: Kensworth Gate, 200-204, High Street, Dunstable, Beds. LU6 3HS
Registered England & Wales: 5815110 VAT Registration No: 927 6746 81