

DATA AUDIT & DELETION PLAN

Scope and Purpose

Caritas is committed to the efficient management of our records for the effective delivery of our services, to document our principal activities and to maintain the corporate memory. Records and information should only be retained when there is a business need to do so. Under GDPR Regulations, personal data processed by Caritas must not be retained for longer than is necessary for its lawful purpose.

Document Type	How long to keep for (and source of requirement)
Personal Records	
<ul style="list-style-type: none"> Work-seeker records including Application Form/CV, ID checks, Terms of Engagement (also see below), details of assignment, opt-out notices and Interview notes for unsuccessful candidates Hirer records including client details, Terms of Business (see below), Assignment/vacancy details 	1 year from the last date of supply or introduction to your client (Conduct of Employment Agencies and Employment Business Regulations 2003 (Conduct Regulations))
Terms of Engagement with temporary worker 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) (5 years in Scotland)
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 you should only keep records for as long as is necessary
References	Under data protection laws only keep records for as long as necessary. However, the Conduct Regulations require references to be kept for 1 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 – must not be alterable
Criminal Record Checks/Disclosure Barring Checks	There is no longer a 6 month time limit on how long DBS certificates can be kept for. 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’
National Minimum Wage documentation: <ul style="list-style-type: none"> Total pay by the worker and the hours worked by the worker 	For HMRC purposes: 3 years after the end of the pay reference period following the one that the records cover (National Minimum Wage Act

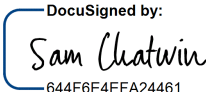
<ul style="list-style-type: none"> • Overtime/shift premia • Any deduction or payment of accommodation • Any absences e.g. rest breaks, sick leave, holiday • Any travel or training during working hours and its length • Total number of hours in a pay reference period 	1998) Or 6 years (5 in Scotland) in order to show that you have paid at least National Minimum Wage rates if a breach of contract claim is brought against you
Sickness Records – Statutory Sick Pay	Records can be kept in a flexible manner which best suits your business but should be kept for Payroll purposes
Statutory Maternity, Paternity, Adoption Pay	3 years from the end of the tax year to which it relates
Pensions Auto-Enrolment (including auto-enrolment date, joining date, opt in and out notices, contributions paid)	6 years except for opt out notices which should be kept for 4 years
Gender Pay Gap reporting	1 year
Company Financial Records	
VAT	6 years – please see an overview of VAT record keeping on the Gov.uk website
Company Accounts	6 years – please see an overview of running a Limited Company on the Gov.uk website
<ul style="list-style-type: none"> • Payroll Information • CIS Records 	3 years from the end of the tax year – please see Gov.uk guidance on keeping records for business
ITEPA (the intermediaries legislation) records	Report due every quarter, to be kept for no less than 3 years after the end of the tax year to which they relate

Date of policy: February 2023

This policy will be reviewed every 12 months (as a minimum).

Review Date: February 2024

Safeguarding Manager – Samantha Chatwin

Signed:  644F6E4EFA24461...

Date: