

## ANNEX 1 – RECORD RETENTION SCHEDULE

Gatmore establishes retention schedules or procedures for specific categories of data. This is done to ensure legal compliance (for example with our data protection obligations) and accomplish other objectives, such as protecting intellectual property and controlling costs.

Employees should comply with the retention periods listed in the Record Retention Schedule below, in accordance with Gatmore's Data Retention Policy.

If you hold data which is not listed below, please refer to the Gatmore Data Retention Policy. If you still consider your data should be listed or if you become aware of any changes that may affect the periods listed below or if you have any other questions about this record retention schedule, please contact David Cassells, Data Protection Manager.

Type of record	Statutory Instrument / Code of Practice	Retention period or recommendation
<b>Employment Personal Data Records</b>		
Disclosure and Barring Service (DBS), formerly Criminal Records Bureau (CRB), checks and disclosures of criminal records forms	Rehabilitation of Offenders Act 1974 and Information Commissioner's Employment Practices Code Part 1.7.4 and 2.15.3	Data is deleted following recruitment process unless assessed as relevant to ongoing employment relationship.  Once the conviction is spent, should be deleted unless it is an excluded profession.
Job applications and interview records of unsuccessful candidates	The Information Commissioner: Employment Practices Code Part 1: recruitment and selection (1.7.5)	6 months after notifying unsuccessful candidates (or longer, if there is a clearly communicated policy to keep candidates CVs for future reference).
Current Bank details	N/A	No longer than necessary.
Immigration checks	Immigration, Asylum and Nationality Act 2006	2 years after termination of employment.
Any reportable accident, death or injury in connection with work	Schedule 1, Part II, Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (SI 2013/1471)	3 years at least from the date that the report was made.
Maternity records	Regulation 26, Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960)	3 years after the end of the tax year in which the maternity pay period ends.
Records in relation to hours worked and payments made to workers	Section 9, National Minimum Wage Act 1998.  Regulation 59, National Minimum Wage Regulations 2015 (SI 2015/621)	3 years beginning with the day upon which the pay reference period immediately following that to which they relate ends.

PAYE records	Regulation 97, Income Tax (Pay as You Earn) Regulations 2003	3 years after the end of the tax year to which they relate. However, Gatemore keeps them for 7 years as they may fall within the definition of payroll and wage records.
Personnel and training records Written particulars of employment, contracts of employment, and changes to terms and conditions.	N/A	7 years after employment ceases.
Working time opt-out forms and records to show compliance with the Working Time Regulations (WTR)	Regulations 5 and 9, Working Time Regulations 1998	Whilst the legal requirement is 2 years after the date that they were entered into, Gatemore holds data for 7 years since such records may be relevant to a claim.
Payroll and wage records	Schedule 18, paragraph 21, Finance Act 1998	The legal requirement is 6 years from the financial year-end in which the payments were made, however, Gatemore keeps records for 7 years in case there is a relevant to a claim.
Annual leave records	N/A	7 years at a minimum.
Record of advances for season tickets and loans to employees; and Death Benefit Nomination and Revocation Forms	N/A	During employment and 7 years after repayment/ payment of benefit.
Collective Workforce Agreements; and Works Council minutes	N/A	Permanently.
<b>CORPORATE RECORDS</b>		
Client Trustee Data	Companies Act 2006	7 years after termination of client engagement or after resignation from trustee board.
Investor Data	Companies Act 2006	7 years after redemption from the relevant fund(s).
Board Meetings/Papers	Companies Act 2006	Permanently.
Supplier Contracts	Companies Act 2006	7 years after termination of agreement.
Company registers	Companies Act 2006	Permanently.
Information on former members'	Companies Act 2006	7 years after resignation from post as Member.