

GDPR Guidelines for HR Data & Processes

NB: Throughout these Guideline rows relating to Special Data are highlighted

Recruitment Data

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Application form	To establish suitability for post	HR Shortlisting manager Interviewing manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Consent	6 months after start date
CV	To establish suitability for post	HR Shortlisting manager Interviewing manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Consent	6 months after start date
Photograph	To enable their likeness to be checked on other documents	HR Line manager	Stored in lockable filing cabinet - HR own access to files	Consent	9 months after leaving date
Health questionnaire	To establish if they require adjustments to attend the interview	HR Line manager	Stored in lockable filing cabinet - HR own access to files Stored in lockable filing cabinet - HR own access to files	Consent	6 months after start date
Aptitude testing	To establish suitability for post	Line manager HR	Stored in lockable filing cabinet - HR own access to files Stored in lockable filing cabinet - HR own access to files	Consent	6 months after start date

Ethic monitoring form	To measure co diversity to meet EQ and Div. tracking requirements	HR	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Consent	9 months after leaving date
Interview questions and Interview notes form interview	To record questions asked and responses to ensure compliance with Equality act and to establish suitability for post	HR Interviewing manager	If stored as e-copy: access will be password protected Stored in lockable filing cabinet - HR own access to files	Consent	6 months after start date
Interview scoring sheets	To record answers and attribute a score to establish suitability for post	HR Interviewing manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Consent	6 months after start date
Offer letters	To record contractually what was offered/committed to the candidate	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Consent	9 months after leaving date
Rejection letters	To record reason for rejection	HR	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Consent	6 months after rejection
Recruitment consent form	To establish consent to process data/ store data	HR Data controller	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Consent	9 months after leaving date

Payroll Information

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Payroll records	To enable pay to be processed and payments to be made	Data processor – payroll HR Line manager Finance Manager	If stored as e-copy: access will be password protected Stored in lockable filing cabinet - Finance own access to files	Legal	6 years after leaving
Tax and NI history	To be held for HMRC requirements	HR Data processor - payroll Line Manager Finance Manager	If stored as e-copy: access will be password protected Stored in lockable filing cabinet - Finance own access to files	Legal	6 years after leaving
Tax coding	To enable pay to be processed and payments to be made	HR Line manager Data processor - payroll Finance Manager	If stored as e-copy: access will be password protected Stored in lockable filing cabinet - Finance own access to files	Legal	6 years after leaving
P45	To enable pay to be processed and payments to be made	HR Line manager Data processor - payroll Finance Manager	If stored as e-copy: access will be password protected Stored in lockable filing cabinet - Finance own access to files	Legal	6 years after leaving
P60	To enable pay to be processed and payments to be made and HMRC requirements	HR Line manager Data processor - payroll Finance Manager	If stored as e-copy: access will be password protected Stored in lockable filing cabinet - Finance own access to files	Legal	6 years after leaving

CCJ instructions	To enable pay to be processed and payments to be made and benefits agencies requirements	HR Data processor - payroll Finance Manager	If stored as e-copy: access will be password protected Stored in lockable filing cabinet - Finance own access to files	Legal	9 months after leaving date
Student loan info	To enable pay to be processed and payments to be made and student loan repayment requirements	HR Data processor - payroll Finance Manager	If stored as e-copy: access will be password protected Stored in lockable filing cabinet - Finance own access to files	Legal	9 months after leaving date
Salary sacrifice data	To be held for HMRC requirements	HR Data processor – payroll Line manager Finance Manager	If stored as e-copy: access will be password protected Stored in lockable filing cabinet - Finance own access to files Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	6 years after leaving

Personnel Files

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Offer letters	To record contractually what was offered/committed to the candidate	Line manager HR Data processor - payroll	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	9 months after leaving date
Copy of passport (or other right to work documents – e.g. Biometric visa)	To establish if they have the right to work in the UK	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	2 years after leaving
Health questionnaire Recruitment information	To establish if they are medically capable of carrying out the job that has been offered	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Consent	6 months after start date
Job description	To record detail of the job that they are currently undertaking	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected		6 years after leaving
DBS checks	To record that a DBS check has been carried out To establish that they are suitable for the job and do not pose a risk to children or vulnerable adults	HR	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal or Consent	Top (tear-off) section - 9 months after leaving Main body containing criminal record – 1 month after offer letter accepted

References	To establish that they are suitable for the job	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal or Consent	6 months after start date
Contract of employment	To record their contractual terms of employment under ERA sec 1	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	9 months after leaving date
Other contractual letters (variation letters)	To record their agreed variations to their contractual terms	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	9 months after leaving date
Flexible working requests	To record any flex working requests and any agreed changes / or rejected changes to their contractual terms	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	9 months after leaving date
Restrictive covenants	To record any restrictive contractual terms that will survive post termination	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	For the duration of the covenant after leaving and 6 months thereafter (in case there is a later found breach)
Confidentiality letters	To record any data confidentiality contractual terms that will survive post termination	HR Data controller	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	For the duration of the confidentiality covenant after leaving and 6 months thereafter (in case there is a later found breach)

Data consent forms	To obtain consent for processing of personal data	HR Line manager Data controller	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	9 months after leaving date
Pay scales data – pay point	To record their actual pay and reasons for allocating them a pay point/position on a salary scale	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	9 months after leaving date

Personal Data

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Name	To uniquely identify the employee	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	3 Years after leaving
Address	To be able to identify the employee and send post to	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Consent	3 Years after leaving
NI Number	To uniquely identify the employee for government communication purposes	HR Line manager Data processor - payroll Finance Manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	3 Years after leaving

DOB	To know their age for NMW purposes, redundancy calculations purposes, HGV licence or other age-related qualification purposes, WTD rest break requirements and pension related purposes	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	3 Years after leaving
Details of next of kin	To make contact in emergencies	Line manager HR	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Consent or Vital interests	Upon leaving

Employment History and Qualifications

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Summary of posts held in organisation	To record their history of positions held in your organisation	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Consent	9 months after leaving date
Qualification certificates	To record competencies and qualification obtained relating to their jobs	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal Or Consent	9 months after leaving date

Performance and Development

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Record of training courses attended and expiry dates	To record dates of training courses attended and when training is required to be re-assessed	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal or Consent	9 months after leaving date
Any performance discussions	To record any performance discussion held and improvement requests made	Line manager HR	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	9 months after leaving date
Performance scoring /rating documents	To record any performance rating data that may influence pay decisions	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	9 months after leaving date

Discipline and Grievance

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Disciplinary warnings issued	To record any disciplinary / capability warnings issued and a summary of future behaviour expectations	HR Line manager Disciplinary manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	6 months after expiry of warning

Disciplinary investigations	To make a record of any investigations that have been carried out in relation to this person	HR Line manager Investigation officer	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	12 months after completion of investigation
Grievances raised	To make a record of any grievances or grievance investigations that have been carried out in relation to this person (or raised by this person and a record of any agreed outcomes	HR Line manager Grievance manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	12 months after completion of investigation

Health and Wellbeing

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Absence data	To record number of days absence to allow for absence policy monitoring/trigger points to be complied with	HR Line manager Data processor - payroll Company Medical staff	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	12 months after the end of the absence reference period used for examination of trigger points and adherence to absence policy
Medical reports	To enable the Company to fully understand a medical condition and to know what adjustments might be made in the workplace	HR Line manager Company Medical staff 3rd party benefit provider	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	12 months after receipt of report

Heath questionnaire	To enable the Company to fully understand a medical condition and to know what adjustments might be made in the workplace	Company Medical staff HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	12 months after receipt of report
Self-certificates	To understand the reasons for absence and to allow SSP and/or Co sick pay to be paid under the sick pay policy	HR Line manager Data processor - payroll Company Medical staff	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	12 months after the end of the absence reference period used for examination of trigger points and adherence to absence policy
GP fit notes	To record the reasons for absence and to allow SSP and/or Co sick pay to be paid under the sick pay policy	Company Medical staff HR Line manager Data processor - payroll	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	12 months after the end of the absence reference period used for examination of trigger points and adherence to absence policy
Private medical benefit records	To enable enrolment in the private medical benefit	Company Medical staff HR 3rd party benefit provider	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	12 months after the data was provided to the 3 rd Party provider

Working Time

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Working time recording data	To ensure compliance with WTD time recording requirements	HR Line manager Data processor - payroll	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	9 months after leaving date
Time and attendance data	To ensure compliance with WTD time recording requirements	HR Line manager Data processor - payroll	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	9 months after leaving date
Opt-out to 48-hour rule	To ensure compliance with WTD 48 hour opt-out recording requirements	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	9 months after leaving date
Night workers' health questionnaire	To ensure compliance with WTD time recording requirements for night workers	Company Medical staff HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	24 months after receipt of report

Ethnic Monitoring

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Ethnic monitoring form	To feed into the companies tracking of ethnic monitoring to allow for the delivery of the EQ and Div. targets	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	9 months after leaving date

Travel and Expenses

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Travel expenses submitted	To enable reimbursement of proper expenses To ensure adherence to the Travel expense policy	Finance Manager Data processor – payroll HR Line manager	If stored as e-copy: access will be password protected Stored in lockable filing cabinet - Finance own access to files	Legal	6 years after leaving

Employee Surveys

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Data of their submissions	To record their comments, suggestions about the company To enable rewards under the staff survey and participation policies	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal Or Consent	9 months after leaving date

Information sent to 3rd Parties

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Pensions	To enable participation in the pension scheme	HR Data processor - payroll Finance Manager 3 rd party benefit provider	Stored in lockable filing cabinet - Finance and HR own access to files If stored as e-copy: access will be password protected 3 rd party benefit provider to store either in lockable filing cabinets or password protected server storage data	Legal or Consent	12 months after the data was provided to the 3 rd Party provider
Medical benefits	To enable participation in the private medical scheme	Company Medical staff Data processor – payroll HR 3 rd party benefit provider	Stored in lockable filing cabinet - Finance and HR own access to files If stored as e-copy: access will be password protected 3 rd party benefit provider to store either in lockable filing cabinets or password protected server storage data	Legal	12 months after the data was provided to the 3 rd Party provider
Childcare vouchers	To enable participation in the childcare voucher scheme	Line manager Data processor - payroll 3 rd party benefit provider HR	Stored in lockable filing cabinet - Finance and HR own access to files If stored as e-copy: access will be password protected 3 rd party benefit provider to store either in lockable filing cabinets or password protected server storage data	Legal	12 months after the data was provided to the 3 rd Party provider

EAP	To enable participation in the employee assistance programme/ helpline scheme	Company Medical staff HR	Stored in lockable filing cabinet - Finance and HR own access to files If stored as e-copy: access will be password protected 3rd party benefit provider to store either in lockable filing cabinets or password protected server storage data	Consent	12 months after the data was provided to the 3 rd Party provider
Bike to work	To enable participation in the bike to work scheme	HR Data processor – payroll Finance Manager Line manager	Stored in lockable filing cabinet - Finance and HR own access to files If stored as e-copy: access will be password protected 3rd party benefit provider to store either in lockable filing cabinets or password protected server storage data	Legal	12 months after the scheme has completed and the bike is transferred to the employee

Future References

Data Type	Why is it collected	Who can access	Security	GDPR reason	Retention limit
Copy of references sent to prospective employers	To maintain a record of what has been sent in response to a reference request to ensure compliance with false representation legislation	HR Line manager	Stored in lockable filing cabinet - HR own access to files If stored as e-copy: access will be password protected	Legal	3 Years after leaving