



RG & SSP

Employee Data Retention Policy

(UK and Ireland based colleagues)

**This policy applies to
colleagues of SSP UK
& Ireland, RG and
SSP Group
colleagues based in
the UK**

Purpose and Scope

SSP & RG is committed to protecting the privacy and security of your personal information.

This Data Retention Policy describes how we collect and use personal information about you before, during and after your working relationship with us, in accordance with the General Data Protection Regulation 2016 (GDPR).

It applies to all employees, workers and contractors.

The purpose of this policy is to provide guidance to prospective, current and past colleagues about the retention of any personal data SSP & RG holds on them.

Personal data is defined as data which relates to a living individual who can be identified from that information.

This policy is to inform you about what personal information is kept, for how long and for what purpose(s).

About SSP & RG

SSP & RG is a "data controller" with Head Office at **169 Euston Road, London NW1 2AE**. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the private information we collect about you.

This Data Retention Policy applies to prospective, current and former employees, workers and contractors. This policy does not form part of any contract of employment or other contract to provide services. We may update this policy at any time.

It is important that you read this policy, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using your personal information.

Principles

This policy and associated procedure incorporate the following principles.

- ✓ **Good faith**
The policy will be applied to all colleagues in a consistent manner and without discrimination.
- ✓ **Fairness**
Any action taken will be reasonable and necessary. Employees involved are entitled to be treated with courtesy and respect.
- ✓ **Confidentiality**
Information raised in line with this policy will only be shared with individuals who have a need to know.
- ✓ **Representation**
Should a colleague be invited to attend a formal meeting to discuss any concerns they are entitled to be accompanied by a representative.

2018 General Data Protection Regulation (GDPR)

SSP & RG has an obligation to all prospective, current and past colleagues to ensure that their personal information is managed appropriately and that SSP & RG is transparent about how such personal data is processed. This means that SSP & RG is able to:

- ✓ Tell prospective, current and past colleagues how SSP & RG processes their personal data, and who has access to it;
- ✓ Use their personal data for a specific purpose or purposes relating to their potential, current or past employment;
- ✓ Keep appropriate records that are proportionate to the purpose(s) for which the personal data has been collected;
- ✓ Keep records up to date;
- ✓ Keep records for only as long as it is required by law;
- ✓ Provide prospective, current and past colleagues with rights to access their employee records; and
- ✓ Keep records securely.

All colleagues who are responsible for employee records will receive appropriate data protection training and understand their obligations under the General Data Protection Regulation.

GDPR Principles

We will comply with the General Data Protection Regulation. This says that the personal information we hold about you must be:

- ✓ Used lawfully, fairly and in a transparent way;
- ✓ Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- ✓ Relevant to the purposes we have told you about and limited only to those purposes;
- ✓ Accurate and kept up to date;
- ✓ Kept only as long as necessary for the purposes we have told you about;
- ✓ Kept securely.

The Kind of Information We Hold About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

In order to fulfil statutory and contractual requirements, we will collect and retain personal information as stated below:

On application

We typically collect personal information about prospective colleagues and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

At the application stage, we may collect the following personal information:

- ✓ Name
- ✓ Address
- ✓ CV
- ✓ Email Address
- ✓ Telephone
- ✓ Ethnic Origin
- ✓ Referrer's Name
- ✓ Referrer's Email address (If referred by an existing SSP & RG employee)
- ✓ Right to work documentation
- ✓ Criminal Record History
- ✓ Special working requirements
- ✓ Gender
- ✓ Marital Status
- ✓ Details of Disability
- ✓ Religious Affiliation (Northern Ireland only)

Where the individual's application is unsuccessful, the above personal data collected will be automatically deleted within 18 months.

In Northern Ireland, this personal data will be deleted after 1 year so SSP & RG can produce the 'Article 55' reporting on religious affiliation.

On offer of employment

Once an offer of employment is made, we may collect more personal information to ensure we are able to perform the contract we are entering with you (such as paying you or providing a benefit). This enables us to comply with our legal obligations (such as to ensure the health and safety of our colleagues). At this stage we may collect the following additional personal information:

- ✓ Signed offer letter and where applicable, a contract of employment
- ✓ Identification Documents (Passport, Driver's Licence etc)
- ✓ National Insurance number, P45, New Starter Checklist – for the Tax Office
- ✓ Bank account details – to pay you
- ✓ Proof of your right to work - to comply with immigration regulations
- ✓ Work permit from the Local Education Authority (if applicable)
- ✓ Email address – to send your pay slips and all employment related documents
- ✓ Emergency Contact name and number – in case of emergencies
- ✓ Forms relating to life insurance, pension, healthcare and other benefits

During employment

During employment, we will collect additional personal information primarily to allow us to perform our contract with you and to enable us to comply with legal obligations.

In addition to the data collected on application and on offer of employment, the following documents may be collected throughout the duration of employment, some of which may contain personal information:

- ✓ Working time records (including Holidays etc.)
- ✓ Contractual changes
- ✓ Sickness documents (including Fit Notes, Medical Letters etc.)
- ✓ Family friendly documents (including Maternity, Paternity, Adoption etc.)
- ✓ Reasonable adjustments if required
- ✓ Probation reviews / Appraisal materials

- ✓ All documents relating to Consultation / Redundancy situations
- ✓ Disciplinary, Appeal & Grievance materials
- ✓ Training records
- ✓ CCTV footage from units
- ✓ Accident at work information
- ✓ Risk Assessments
- ✓ TUPE documents
- ✓ Step down, transfer or promotion paperwork

After employment

When an employment contract comes to an end, we will retain some personal information for 7 years to comply with legal obligations as listed below. We will delete everything else within 7 years of you leaving SSP & RG.

For the tax office:

- ✓ Name
- ✓ National Insurance number
- ✓ Pay records
- ✓ Job title and dates of employment
- ✓ Sickness absences
- ✓ Taxable benefits

For references:

- ✓ Job title and dates of employment
- ✓ Appraisal paperwork and training records

Other Information for identification purposes:

- ✓ Name
- ✓ Job title and dates of employment
- ✓ Units worked in
- ✓ Dates worked
- ✓ Sickness record
- ✓ Reasonable adjustments
- ✓ Injury information
- ✓ Proof of Right to work documentation
- ✓ Disciplinary & Grievance data
- ✓ TUPE records
- ✓ Religious affiliation

You may request that SSP & RG remove any personal data that is not required by Law or by SSP & RG to fulfil contractual obligations.

If you have any queries or complaints regarding our treatment of your personal data, please contact us at gdpr@ssp-intl.com.

Your Rights Under GDPR (Subject Access Rights):

Under certain circumstances, the GDPR provides you the following rights:

Right to be informed

You have the right to know what personal data we store about you. This enables you to understand how we use your personal data.

Right of access

You have the right to access your personal data and supplementary information. This enables you to be aware of and verify the lawfulness of the processing.

Right to rectification

You have the right to request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Right to erasure (right to be forgotten)

You have the right to ask us to delete or remove personal information where there is no compelling reason for us to continue processing it. Please note that this right does not provide an absolute 'right to be forgotten'.

Right to restrict processing

You have the right to request the restriction of processing your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Right to data portability

You have the right to obtain and reuse your personal information for your own purposes. This enables you to request to receive your data in a structured commonly used and machine-readable format (i.e. a data format that can be automatically read and processed by a computer, for example CSV, JSON and XML data formats – excluding PDF documents and scanned images).

Right to object

You have the right to object to processing based on legitimate interests, direct marketing and research. This enables you to object on grounds relating to your particular situation subject to these grounds being legitimate.

Rights related to automated decision making including profiling

You have the right to object to profiling and automated decision making in certain circumstances. This enables you to have meaningful information about the logic involved in the decision making process when your personal information is used.

How To Exercise Your Subject Access Rights

Every employee has a right to know and access their personal information held by SSP & RG in accordance with this policy, to check the accuracy of any personal data provided to SSP & RG, and to have any personal data details updated.

All Subject Access Requests for employee personal data held by SSP & RG can be made by sending an email to: gdpr@ssp-intl.com (ex-colleagues) or hr.advisoryteam@ssp.uk.com (current colleagues)

Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please send an email to gdpr@ssp-intl.com.