



## HR Data Risk Assessment and Retention Schedule

This document provides clarity on the types of data stored, maintained and processed by the HR Department and how long that information is retained.

By: Heather Bell  
For: Robertson Group  
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Type of employee data	Why do we process it?	Where is the data stored/which system?	What is the lawful basis of processing the data?	Are the employee rights negatively impacted/why?	If the employee rights are negatively impacted, are there any measures that could reasonably reduce that impact?	Are you satisfied that the process is lawful?	Retention period
Employee contact information – name, telephone numbers, home address.	This information is stored to ensure that contact can be maintained with our employees, so that we have correspondence address and telephone number e.g. if an employee is off sick or is unexpectedly absent	HRDB Sharepoint Payroll	Contractual necessity Legitimate interests	No as long as security of information is maintained	N/A	Yes	Until 7 years post employment.
Date of Birth/ Age	This information is stored to ensure benefits administration such as pension and salary entitlements are in line with relevant age, also required as Proof of ID for Health Surveillance testing	HRDB	Contractual necessity Legitimate interests	No as long as security of information is maintained	N/A	Yes	Indefinitely
A copy of the identification documents that were provided by the employee at the start of their employment.	We are required to obtain copies of identification documents that  Demonstrate an employee's right to work in the UK, to retain.	Sharepoint  Payroll	Legal obligation	No as long as security of information is maintained	N/A	Yes	As long as in employment. Expired data kept until new ID provided.
Salary and rate of pay details	So that we know what pay / salary our employee is due at our payroll each month. Historical pay data is also stored.	HRDB Sharepoint Payroll	Contractual necessity	No as long as security of information is maintained	N/A	Yes	Historical payroll /NMW data must be kept on file for 3 years. 7 years post employment
Employee gender	We require this for Gender Pay Reporting	HRDB  Payroll	Legal obligation	No as long as security of information is maintained	Where those do not identify as male/female or other groups. To suggest our HR system covers these options.	Yes	As long as in employment and 12 months thereafter for the purpose of Gender Pay Reporting
Employee email address (personal).	We require this from a contact point of view / contact on icims.  Further, for payroll payslips.	HRDB  Payroll	Contractual necessity		Employees may opt out of this and paper payslips offered as an alternative.	Yes	As long as in employment with Robertson Group.
Employee bank details	Employee bank details are obtained, stored and used to pay employees their salary and other contractual entitlements under their contract of employment	HRDB Payroll Sharepoint	Contractual necessity Legitimate interests	It is possible that employees will be concerned that their bank details are disclosed to those with no legitimate interest in knowing them	The following measures are taken to ensure that employee bank details remain secure: secure access to systems using log in credentials/passwords, limited only to those who need that information for processing within HR. Payroll again have to access a secure portal that only they can access to get these details, Payroll then store them in their own systems for processing salaries.	Yes	As long as in employment with Robertson Group.
Employee National Insurance numbers	Employee NI numbers are held and used to administer the appropriate and required deduction of income tax and National Insurance	Payroll HRDB	Legal obligation	No as long as security of information is maintained	N/A	Yes	As long as in employment and thereafter 7 years.
Information regarding employees' medical history and health conditions and, where relevant, that of their dependents.  This is sensitive personal data.	This information is obtained and passed onto the insurance company who operates the employer's private medical insurance scheme for its purposes	HRDB Sharepoint	Contractual necessity Legitimate interests	Health information is often viewed as sensitive and private so there may be some employees who could view the obtaining of this information as a breach of privacy	None of the employer's employees have access to this data. The information is provided online by the employee with no access from Robertson.	Yes	Indefinitely for personal injury purposes. Only given access only to those as necessary.
Details of employees' next of kin	This information is retained so that the employee's next of kin can be contacted in the event of an emergency regarding the employee	HRDB	Consent. The employee is asked to sign a form confirming that they agree to their next of kin being contacted in the event of an emergency.	N/A	N/A	Yes	Only during period of employment.
Information regarding the employee's work performance / appraisal information.	This information is gathered and used during the employee's performance appraisals and other dialogue between the employee and their line manager	Sharepoint	Legitimate interests	No as long as security of information is maintained	N/A	Yes	As long as in employment.
Death in service expression of wish information	To ensure that in the event of the death of an employee during their service with Robertson Group, the Trustees are advised of where monies and entitlements are to be paid, in line with our death in service scheme.	HRDB Sharepoint	Legitimate Interest  Consent	It is possible that some employees could feel that this is intrusive or that the details could change from time to time.	As long as security is maintained and employees know how to update this information, the risks are minimized.	Yes	As long as in employment and checked/updated periodically.
	To ensure that information is retained and managed with regards	HRDB	Legitimate Interest	Robertson Group have a legitimate interest to ensure that employees are attending work and if not, the reasons for that, in	It is possible that employees could feel that there is a breach of	Absence is linked to pay / Company sick pay entitlements and SSP entitlements.	Indefinitely for

Sickness absence record – length and reasons for absence.	to absence and health and wellbeing	Payroll Sharepoint	Contractual necessity	line with our contract of employment, policies and to enable duty of care to be managed.	privacy	The information is stored securely and only used and given on a basis of processing for managing	purposes or personal injury
Pension contribution information	This information is retained for the purposes of satisfying our employer pension obligations.	Payroll HRDB Standard life / other provider	Contractual necessity Legal obligation	Robertson Group are legally obliged to offer a pension so this is unlikely to cause any concern to employees.	N/A	Yes	for life. Other pension arrangements must be kept for 12 years after the benefit ceases
Maternity / Paternity / Adoption and Shared Parental leave information	This information is collated and processed for the purposes of providing SMP and SPP payments to employees who are eligible. Further the information is collated and processed for the purposes of maternity risk assessments and duty of care.	HRDB Sharepoint Payroll	Legal obligation Contractual necessity	Not as long as security of information is maintained.	N/A	Yes	3 years post employment
Disclosure / DBS / PVG information	This information is collated and stored for the purposes of ensuring our safeguarding policies. Robertson are only required to retain certificate numbers, and destroy the paper copies.	HRDB Sharepoint	Legitimate interests Legal obligation [PVG].	Some employees may feel that this is a breach of privacy, in particular where PVG is not required, but a basic or enhanced disclosure.	As long as policies are stated and as long as information is secure and maintained correctly. Only information such	N/A	As long as in employment
Substance testing results (random, for cause and other).	This information is collated and stored for the purposes of random and for cause substance testing, and in order for the Company to determine whether employees are attending work under the influence of substance / alcohol. Duty of care and health and safety are key drivers in this.	Sharepoint	Legitimate interests	Employees may feel that this is a breach of privacy and not be willing to disclose information about medication or health to lab technicians.	Information is only stored and kept by those as necessary and negative (clear) results will be destroyed after invoicing.	Yes	Retain negative results in line with disciplinary policy.
Disciplinary / grievance and investigation notes.	This information is gathered and used during the employee's any formal investigation under the auspices of the Robertson disciplinary and grievance policy and procedure, and those formalised between the employee and their line manager	Sharepoint HRDB	Legitimate interests	No, as long as data security is maintained.	N/A	Yes	Within auspices of disciplinary policy
Registration details of private vehicles.	This information is gathered and used to allow for identification of cars permitted to park on company premises and/or to contact the owners to move their vehicle if required.	HRDB	Legitimate interests	It is possible, although unlikely, that some employees could view the recording of this data as a breach of their privacy.	Only those who require access to this information to fulfil the duties of their role will be given access	Yes	As long as in employment

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Employee name and email address store on our eAcademy (e-learning portal)	To allow each employee access to the on line portal and training resources contained in this	eAcademy	To capture and employees training records – satisfying both mandatory training requirements and development support	No as long as security of information is maintained	N/A	Yes	tbc
Training certificates for employees held on Conject	Historical training certificates to show employees have correct qualifications / training to do their job	Conject	To evidence mandatory training has been fulfilled and up to date.	No as long as security of information is maintained	N/A	Yes	tbc
Training certificates for employees held on Robertzone	Historical training certificates to show employees have correct qualifications / training to do their job	Robertzone	To evidence mandatory training has been fulfilled and up to date.	No as long as security of information is maintained	N/A	Yes	tbc
Training records of completed training held on HR database	To identify what training has been completed and gaps for an individual's training	HR Database	To report on training completion for colleagues and identify gaps in mandatory training	No as long as security of information is maintained	N/A	Yes	tbc
Employee name, address and NI number passed to training providers	As many of our training courses are delivered externally, this information is required by the training provider to carry out this training	Robertzone	To ensure our employees receive the appropriate mandatory training for their role	No as long as security of information is maintained	N/A	Yes	tbc

Type of candidates/employee data	Data details required	Why do we process it?	Where is the data stored/which system?	What is the lawful basis of processing the data?	Are the employee rights negatively impacted/why?	If the candidates/employee rights are negatively impacted, are there any measures that could reasonably reduce that impact?	Are you satisfied that the process is lawful?	Retention period
Personal Data	Full name email address home address phone number social URL account job title CV	This information is required to be able to contact candidates and short list them (by location, specialism) and later for the purpose of their contact. We use their phone number, email address to correspondence in relation to interview and offers. Home address is used for the contract and search candidates by location. Social URL and CV to review candidates experience, education and employment history.	HRDB iCims Sharepoint Outlook (email)	Contractual necessity Legitimate interests	No as long as security of information is maintained	N/A	Yes	4 years from application/registration on iCIMS
Qualification Data	CV  Copy of Certificates once employed	On the CV to verify that candidate meets minimum qualification for the role. CVs can be processed as part of a Bid submission to a client to show the qualifications/skills/background of those leading the project. To confirm that qualification are valid for the role.	iCIMS Bids/Proposals	Legitimate Interest  H&S regulations	No as long as security of information is maintained	N/A	Yes	4 years from application/registration on iCIMS Once bid has come to completion As long as in employment
Proof of ID	Country identification card Passport Birth Certificate Proof of NI number (card or P45, P60, HMRC letter)	We are required to obtain copies of identification documents that demonstrate a candidate has right to work in the UK. Reviewed at the interview stage to check if the candidate have the right to work in the UK and kept once employee.	iCIMS Sharepoint Outlook (email)	Legal obligation	No as long as security of information is maintained	N/A	Yes	As long as in employment. Expired data kept until new ID provided.
Desired Salary	desired salary for applicants	To determine whether the role is appropriate	iCims	legitimate interest	No as long as security of information is maintained	N/A	Yes	4 years from application/registration on iCIMS
Salary and benefits at offer	Salary being offered	To offer the salary to successful applicants	HRDB Sharepoint Payroll iCims	Contractual necessity	No as long as security of information is maintained	N/A	Yes	4 years from application/registration on iCIMS
EEO questions	gender ethnic group marital status age sexual orientation religion caring responsibility	For statistical purposes - information is anonymised	iCims	Legitimate Interest	No as information is anonymised therefore individuals are not identifiable	N/A	Yes	As long as in employment or 4 years from application/registration on iCIMS
References/Referee Details	Contact details of referee's	Take references of candidates offered that are joining the business	HRDB iCims	Legitimate interest	No as long as security of information is maintained	N/A	Yes	4 years from application/registration on iCIMS
Employee bank details	iCims	Employee bank details are obtained, stored and used to pay employees their salary and other contractual entitlements under their contract of employment	HRDB Payroll Sharepoint iCims	Contractual necessity Legitimate interests	It is possible that employees will be concerned that their bank details are disclosed to those with no legitimate interest in knowing them	The following measures are taken to ensure that employee bank details remain secure: secure access to systems using log in credentials/passwords, limited only to those who need that information for processing within HR. Payroll again have to access a secure portal that only they can access to get these details, Payroll then store them in their own systems for processing salaries.		As long as in employment with Robertson Group.
Area of interest	specialism of interest to applicants	understand applicants interests of employment	iCims	Legitimate interest	No as long as security of information is maintained	N/A		4 years from application/registration on iCIMS
Employee National Insurance number	NI Number	Employee NI numbers are held and used to administer the appropriate and required deduction of income tax and National Insurance	Payroll HRDB	Legal obligation	No as long as security of information is maintained	N/A	Yes	As long as in employment and thereafter 7 years.
Next of kin details	Emergency contact information	To contact next of kin in case of emergency	iCims HRDB	Legitimate interest	No as long as security of information is maintained	N/A	yes	As long as in employment with Robertson Group.
Death in service details	Contact information and details for death in service beneficiary	To ensure that in the event of the death of an employee during their service with Robertson Group, the Trustees are advised of where monies and entitlements are to be paid, in line with our death in service scheme.	HRDB iCims Sharepoint	Legitimate Interest  Consent	It is possible that some employees could feel that this is intrusive or that the details could change from time to time.	As long as security is maintained and employees know how to update this information, the risks are minimized.	Yes	As long as in employment and checked/updated periodically.
Exit Interview	Name Information on why people are leaving the business	To understand patterns, reasons and information as to why employees are leaving the business.	Survey Monkey Sharepoint	legitimate interest	No as long as security of information is maintained	As long as security is maintained and employees know how to update this information, the risks are minimized.	Yes	2 years post employment
Interview notes, feedback from interview, scoring sheets, interview assessment information	Candidates full name and position they applied for interview notes interview assessments candidates scoring sheets	To assess candidate suitability for the role and any agreement per-employment	iCIMS Outlook	Legitimate interest	No as long as security of information is maintained	N/A	yes	As long as in employment with Robertson Group.