

Data Protection Retention Policy

Company Name:	Ikigai Consulting Group LTD ("the Company") Trading as Ikigai®
Policy No.	4
Policy Name	Data Protection Retention Policy – Work Seekers
Date:	11 January 2025
Version:	V3

1 Introduction

1 This policy sets out how long employment/recruitment-related information will normally be held by us and when that information will be confidentially destroyed.

2 Responsibility

2 **Nick Chenery, Managing Director** is responsible for implementing and monitoring compliance with this policy.

2.1 **Nick** will undertake an *annual* review of this policy to verify that it is in effective operation.

3 Our process

3.1 Electronic information will be retained for the period specified in our Records Retention Schedule.

3.2 All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints, or grievances.

3.3 Electronically held documents and information must be deleted at the end of the retention period, unless there is a requirement to delay deletion (as per paragraph 3.2)

Records Retention Schedule

This Record Retention Schedule sets out the time periods that different types of records must be retained for business and legal purposes.

The retention periods are based on business needs and legal requirements and should be read in accordance with **Ikigai Consulting Group's [data protection policy](#)**.

Work-seeker records

Record	Retention Period	Storage Format	Lawful basis and reference
<p><i>Work-seeker records</i></p> <ul style="list-style-type: none"> <i>Name/address and if under 22, date of birth</i> <i>Any terms between recruitment business and the work-seeker and any variations</i> <i>Details of the work-seeker's training, experience, qualifications and any authorisation to undertake particular work</i> <i>Names of hirers to whom the work-seeker is introduced or supplied</i> <i>Details of any resulting engagement and date from which it takes effect</i> <i>Details of any enquiries made under Regulations 19, 20 and 22 about the work-seeker and the position concerned</i> 	<p>Kept for six years after the last time of providing you work-finding service and in line with the Limitation Act 1980.</p>	<p><i>Electronic</i></p>	<p><i>Legal obligation</i></p> <ul style="list-style-type: none"> <i>Kept in line with the Conduct of Employment Agencies and Employment Businesses Regulations 2003 (Reg 29)</i> <p><i>Legitimate business interest</i></p> <ul style="list-style-type: none"> <i>To protect the business against any legal claims for breach of contract</i> <ul style="list-style-type: none"> <i>Kept in line with the Limitation Act 1980 (s.5)</i> <i>To keep records to demonstrate that safeguarding processes are adhered to and followed</i> <i>To contact the candidate for any further work-finding services</i> <i>To protect the business against any legal claims</i>

<i>Records relating to/demonstrating compliance with Working Time Regulations 1998:</i> <ul style="list-style-type: none"> • <i>Registration of work and rest periods</i> • <i>Working time opt-out forms</i> 	<i>Kept for two years from the date on which the record was made</i>	<i>Electronic</i>	<i>Legal obligation</i> <ul style="list-style-type: none"> • <i>Kept in line with the Working Time Regulations 1998 (Reg 9)</i>
<i>Copies of identification documents/right to work</i>	<i>Kept for two years from date of termination of employment or when the applicant registered for work finding services if no placement was made.</i>	<i>Electronic</i>	<i>Legal obligation</i> <ul style="list-style-type: none"> • <i>Kept in line with the Immigration (Restrictions on Employment) Order (Art 6(1)(b))</i>
<i>Criminal records information</i> <ul style="list-style-type: none"> • <i>Information forms</i> • <i>DBS check forms</i> • <i>DBS certificates</i> 	<i>12 months from placement or 3 months from registration if no placement was made.</i>	<i>Electronic</i>	<i>Legitimate business interest</i> <ul style="list-style-type: none"> • <i>To demonstrate that safeguarding processes were followed</i>
<i>Gender pay gap reporting information</i>	<i>Kept available for a period of at least three years beginning with the date of publication</i>	<i>Electronic</i>	<i>Legal obligation</i> <ul style="list-style-type: none"> • <i>Kept in line with Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 (Regulation 15)</i>

3 Payroll and salary records

Record	Retention Period	Storage Format	Lawful basis and reference
<i>Intermediary reporting information</i> <ul style="list-style-type: none"> HMRC have produced guidance on the different information required 	Kept for three years after the end of the tax year to which they relate	Electronic	Legal obligation <ul style="list-style-type: none"> Kept in line with Income Tax (Earnings and Pensions Act 2003) (Section 716B) as well as The Income Tax (Pay As You Earn) (Amendment No.2) Regulations 2015
<i>VAT records</i> <ul style="list-style-type: none"> Keep records of sales and purchases Keep a separate summary of VAT called VAT account Issue correct VAT invoices 	Kept for six years	Electronic	Legal obligation <ul style="list-style-type: none"> Please see government guidance
<i>Company accounts</i>	Kept for six years from the end of the last company financial year they relate to (There are circumstances that this would need to be kept shorter/ longer for- please see government guidance for more information)	Electronic	Legal obligation <ul style="list-style-type: none"> Please see government guidance