

Herefordshire Wildlife Trust Data Retention Policy: The Purpose of this document is to set policy on the detail the procedures for the retention and disposal of personal data to ensure that we carry this out consistently and fully document any actions taken. Unless otherwise specified this document refers to both data held in paper format and electronically.

BUSINESS AREA	DATA DESCRIPTION	POINT OF DATA CAPTURE	CATEGORIES OF PERSONAL DATA							PURPOSE OF DATA PROCESSING	SUGGESTED RETENTION PERIOD	SUGGESTED LAWFUL BASIS	COMMENTS / reference material / process documents	STAFF MEMBER RESPONSIBLE
			Contact details	Date of birth	Bank/payment details	Health information	Criminal records	Other	Photo					
Governance – Charity and Volunteers including Trustees, Local Groups, Volunteer Wardens, Watch leaders	Details of complainant	Complaint	Y	N	N	Y	N	N	Y	Respond and record	3 years	Legitimate Interest	Fundraising Regulator require details about complaints	Development Director
	Details of data subject	Subject Access Requests	Y	N	N	N	N	N	N	Record of request	3 years	Legal obligation		Development Director
	Trustee details	Application form	Y	Y	Y	Y	Y	Register of Interests	Y	Charity administration	For 3 years after the financial year of ceasing to be a Trustee	Legal obligation	Charity Commission	Business Support Officer
	Volunteer details including Wardens	Volunteer form (including Wardens Agreement)	Y	Y	Y	Y	Y	Referee's contact details	Y	Administration of volunteering	Duration of volunteering	Performance of contract		Volunteer line manager
	Watch Leader details	Watch leader application form	Y	Y	Y	Y	Y	DBS check	Y	Administration of volunteering	Duration of volunteering and 40 years beyond	Legitimate Interest	Safeguarding	Engagement co-ordinator
	Emergency contact details for volunteers	Volunteer form	Y	N	N	N	N	N	N	Volunteer records	Duration of volunteering	Consent	Data provided by person that is not the data subject	Volunteer line manager
IT and Finance , Data team	Payment details	Invoices, cheques and bank statements	Y	N	Y	N	N	N	N	Processing payment	7 years after relevant financial year (longer if stipulated by funder, e.g. 20 years for EU grants).	Legal obligation	HMRC	Finance Manager
	Details of request for no charity contact	FPS Suppression List	Y	N	Y	N	N	N	N	Excluding from contact lists	Indefinite	Consent	Fundraising Regulator	Finance Manager
	Details of complainant	Insurance claims	Y	N	Y	Y	N	N	Y	Respond and record	10 years after settlement	Legal obligation	HMRC	Finance Manager
Conservation: Living Landscapes, Reserves and Wider Countryside	Landlord/ Landowner details	Various including Contract/SLA	Y	N	Y	N	N	N	N	Administering contract/SLA	For duration of contract/SLA and 7 years beyond	Performance of contract		Living Landscapes Director
	Tenant details	Various including Contract/SLA	Y	N	Y	N	N	N	N	Administering contract/SLA	For duration of contract/SLA and 7 years beyond	Performance of contract		Estates Manager
	Details of landowners (neighbours)	Various including personal contact, parish councils & land registry	Y	N	N	N	N	N	N	Reference (e.g. to enable contact in cases of emergencies, undertaking work that might affect them or maintaining good neighbourly relations)	For duration of land ownership	Legitimate Interest		Living Landscapes Director
	Details of other landowners (CWS / conservation projects etc)	Various including personal contact, parish councils & land registry	Y	N	N	N	N	N	N	Ability to contact landowners to seek permission to acquire up-to-date biological information through surveys and discharge charitable objectives related to providing management advice & support. Records of surveys undertaken & contact / dialogue with landowners	For duration of land ownership	Legitimate Interest		Living Landscapes Director
	CCTV images	CCTV	N	N	N	N	N	N	Y	Crime prevention	1 month	Legitimate Interest	Privacy Impact Assessment required as well as signage	Estates Manager
	Records of reserve management	Various	Y	Y	Y	Y	N	N	N	Historic record	in perpetuity	Legitimate Interest		Estates Manager
Records Centres, Research and Monitoring	Applications for Wildlife Training Workshops	Application form	Y	N	Y	Y	N	N	N	Administration of booking	7 years after relevant financial year	Performance of contract	HMRC	Living Landscapes Director
	Details of record submitter	Various inc website	Y	N	N	N	N	N	N	Verifying record	in perpetuity	Legitimate Interest		Conservation Manager
	Contact details of requester of records	Various	Y	N	Y	N	N	N	N	Administration of data request	7 years after relevant financial year	Legitimate Interest		Conservation Manager
	Biological reports and field sheets	various	N	N	N	N	N	N	N	Scientific record	in perpetuity	Legitimate Interest	Just names	Conservation Manager
Membership and Supporter Engagement	Member details	Membership application form	Y	Y	Y	N	N	inc. children	N	Administering membership	For duration of membership and 7 years beyond	Performance of contract	HMRC	Membership Officer
	Donor details	Donation	Y	N	Y	N	N	N	N	Administering and recording income	7 years after relevant financial year	Legal obligation	HMRC	Development Director
	newsletter distribution lists	Various	Y	N	N	N	N	N	N	Dispatch of enews	1 day	Consent	PECR	Membership Officer
	Warm names/event attendees	Sign in forms	Y	N	Y	N	N	N	N	Marketing Record keeping	2 years 1 year after last funding payment	Legitimate Interest	Different for children's data - safeguarding?	Development Director
Queenswood Parking Permits	Home address, email address, other personal details, car registration number	Sign up forms in QW shop	Y	Y	N	N	N	Y	N	Fulfilment of issuing permit, and sending renewal communications	1 year	Legal obligation		John Clark
Queenswood Parking Complaints	Names and phone numbers of individuals wishing to contest a PCN (parking charge notice)	Website enquiry function	Y	N	N	N	N	Y	N	Administration of enquiry/complaint	1 year	Legitimate Interest	We contract parking management to a third party, therefore only hold data on individuals who contact us directly	Estates Manager
Fundraising & Retail	Orders via online shop	Website	Y	N	N	N	N	N	N	Fulfilment of order	7 years after relevant financial year	Performance of contract	HMRC	Retail Manager
	Purchasers	Point of sale	N	N	Y	N	N	N	N	Recording income	7 years after relevant financial year	Performance of contract	PCI	Retail Manager
	Legacy pledger details	Legacy form	Y	N	N	N	N	N	N	Recording legacy pledge	7 years after the financial year of the legacy payment	Legal obligation	HMRC (note GDPR does not apply to the legator after death)	Development Director
	Legator/Beneficiary/Witness details	Will	Y	N	N	N	N	potential for childrens data (beneficiary)	N	Compliance with legator's instructions	7 years after relevant financial year	Legal obligation		Development Director
	Gift Aid eligibility	Gift Aid declarations	Y	N	N	N	N	Signature	N	Claiming Gift Aid	7 years after relevant financial year	Legal obligation	HMRC	Membership Officer
Engagement (Education, WildPlay & Community Outreach)														
	Work experience (under 18)	Engagement staff	Y	Y	N	Y	N	parent's signature	N	Safeguarding	Date of birth of the child + 25 years	Legitimate Interest	NSPCC recommendation	Engagement Co-ordinator
	School / venue contacts	Engagement staff	Y	N	N	N	N	N	N	Marketing	2 years	Consent	Consent refresh process required	Engagement Co-ordinator
Communications														
	Event bookings including school bookings	Various inc website	Y	N	Y	N	N	children	N	Administering event booking	7 years after relevant financial year	Legal obligation	HMRC	Events Officer
	Campaign supporters	Various	Y	N	N	N	N	N	N	Record support for campaign	3 months after campaign ends	Legitimate Interest		Communications Officer
	IP address	Google analytics	N	N	N	N	N	IP address	N	Monitoring website traffic	1 year	Legitimate Interest		Communications Officer
All staff	Contractor contact details, training certificates, Licences, insurance, CVs, references - includes stalkers, graziers	Various including Contract/Statement of work	Y	N	Y	N	N	N	N	Administering contract/statement of work	For duration of contract/statement of work and 7 years beyond (longer if stipulated by funder, e.g. 20 years for EU grants).	Performance of contract	HMRC	All
	Supplier details	Contract/Statement of work	Y	N	Y	N	N	N	N	Administering contract/statement of work	For duration of contract/statement of work and 7 years beyond (longer if stipulated by funder, e.g. 20 years for EU grants).	Performance of contract	HMRC	All
	Prospective contractor/supplier details including graziers/stalkers	Various including tender documents	Y	N	N	N	N	N	N	Administering tender process	For duration of contract/statement of work and 7 years beyond (longer if stipulated by funder, e.g. 20 years for EU grants).	Legitimate Interest		All
	Details of another person (in any context not covered above)	Various inc website	Y	N	N	N	N	N	N	Correspondence	For duration of correspondence	Legitimate Interest	Does the retention depend on the purpose?	All
	Contact preferences	Various	Y	N	N	N	N	N	N	To administer communications	For duration of relationship	Legitimate interest		All
	Raffle/competition entrants	Competition entry	Y	N	N	N	N	N	N	Administering competition	1 week	Consent	Clear consent capture on entry form	All
	Internal documents with staff contact details	Staff lists	Y	N	N	N	N	N	N	Providing instructions	Indefinite, annual review for accuracy	Legitimate Interest		All

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			Contact details	Date of birth	Bank/payments details	Health information	Criminal records	Other	Photo					
	Copies of documents	Various	Y	Y	Y	Y	Y	Y	Y	Reference	1 day for sensitive 1 week for non sensitive data	Legitimate Interest		All
HR and H&S	Accident books, accident records	Accident books, and email	Y	N	N	Y	N	N	N	Record and respond if necessary	3 years from date of the last entry (or, if the accident involves a child/young adult, then until that person reaches the age of 21. See below for accidents involving chemicals or asbestos	Statutory requirement	Statutory authority: The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended, and Limitation Act 1980. Special rules apply concerning incidents involving hazardous substances (see below).CIPD HR Keeping records Factsheet	Business Support Officer
	Accident investigation reports	electronic form and Word documents	Y	N	N	Y	N	N	N	Record and respond if necessary	3 years from date of the last entry (or, if the accident involves a child/young adult, then until that person reaches the age of 21. See below for accidents involving chemicals or asbestos	Statutory requirement	Statutory authority: The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended, and Limitation Act 1980. Special rules apply concerning incidents involving hazardous substances (see below).CIPD HR Keeping records Factsheet	Business Support Officer
	Medical records	OH Form upon joining; OH session;response to request for medical information from GP/other medical professional; sickness self-cert and Return to work forms	Y	Y	N	Y	N	N	N	provide a baseline for the health status of staff and identify those with special health needs; provide an effective workplace health surveillance system; identify patterns of ill health and work areas with specific risk; help EB in its responsibility for the notification of accidents & ill health	As long as possible with transferable information being kept for 40 years from the date of the last entry, or longer if required under the Control of Asbestos at Work Regs 1987 and the COSHH Regs 1988.	Statutory requirement	HSE CIPD HR Keeping records Factsheet	Business Support Officer
	Medical records under the Control of Asbestos at Work Regulations	OH session and/or GP report or examination certificate	Y	Y	N	Y	N	N	N	Records of employees exposed to asbestos	40 years from the date of the last entry.	Statutory requirement	The Control of Asbestos at Work Regs 2002 (SI 2002/2675). Also see the Control of Asbestos Regs 2006 (Business Support Officer
	Medical records as specified by the Control of Substances Hazardous to Health Regulations (COSHH)	OH session and/or GP report or examination certificate	Y	Y	N	Y	N	N	N	Records of employees exposed to hazardous chemicals	40 years from the date of the last entry.	Statutory requirement	Statutory authority: The Control of Substances Hazardous to Health Regulations 1999 and 2002 (COSHH) (Sis 1999/437 and 2002/2677).	Business Support Officer
	Statutory Maternity Pay records, calculations, certificates (Mat B1s) or other medical evidence	Email from employee, Mat B1s supplied by employee, various	Y	N	Y	Y	N	N	N	Processing payments	3 years after the end of the tax year in which the maternity period ends.	Statutory requirement	Statutory authority: The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960) as amended	Business Support Officer
	Records relating to working time (i.e. where employee has formally opted out of the 48-hour working week)	Opt out form	Y	N	N	N	N	N	N	Records	3 years after the end of the pay reference period following the one that the records cover.	Statutory requirement	Statutory authority: The Working Time Regulations 1998 (SI 1998/1833). CIPD HR Keeping records Factsheet	Business Support Officer
	Application forms and interview notes (for unsuccessful candidates)	Job Application forms, application scoring sheets, interview notes and scoring sheets	Y	N	N	N	N	N	N	screening applicants for paid roles	1 year	Legitimate interest	Because of the time limits in the various discrimination Acts, minimum retention periods for records relating to advertising of vacancies and job applications should be at least 6 months. A year may be more advisable as the time limits for bringing claims can be extended. Successful job applicants documents will be transferred to the personnel file in any event. CIPD HR keeping records factsheet.	Business Support Officer
	CVs (unsolicited and those attached to unsuccessful applications)	CVs	Y	N	N	N	N	N	N	1. Screening applicants for paid roles 2. Retention for possible future vacancies	1 year	Legitimate interest	Because of the time limits in the various discrimination Acts, minimum retention periods for records relating to advertising of vacancies and job applications should be at least 6 months. A year may be more advisable as the time limits for bringing claims can be extended. Successful job applicants documents will be transferred to the personnel file in any event. CIPD HR keeping records factsheet.	Business Support Officer
	Application form (successful candidates)	WTHWT Application Form	Y	N	N	N	N	N	N	screening applicant for paid work	Duration of employment	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Risk Assessments under H&S Regs (e.g. stress risk assessment, pregnancy risk assessment)	Risk Assessment Form	N	N	N	Y	N	N	N	Identify special health needs for providing reasonable adjustments and/or identifying work issues that need addressing	Permanently	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Records of consultations with safety representatives and H&S Committees/groups.	Minutes, records of conversation (including email)	N	N	N	N	N	N	N	H&S records of issues and progress of resolution measures	Permanently	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Expression of Wish forms (for Pension)	Expression of Wish Form (upon joining the Trust)	N	N	N	N	N	N	N	For nomination of death benefit beneficiary	12 years after benefit ceases	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Staff Details	Staff Details Form upon joining	Y	N	Y	N	N	Marital status; name of partner/spouse; Emergency contact	N	Payroll, Pension, adding to HR database for processing leave, entitlements etc.	6 years after employment ceases to cover time limit for bringing any civil legal action. However, not sure about emergency contact details	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	References for staff exiting the Trust/or who have exited the Trust	Reference request from prospective employer	N	N	N	N	N	N	N	To fulfil request from prospective employer.	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	References for successful candidates	Reference Form	N	N	N	N	N	Job title; confirmation of dates employed; reason for leaving; employment assessment; any reason known that candidate is inappropriate to have contact with children/vulnerable adults	N	Assessing suitability of candidate for position with the Trust	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Legitimate Interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Passport, working visa etc	photocopy of relevant documents	N	Y	N	N	N	citizenship, place of birth	Y	to determine eligibility to work in the UK	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Statutory Requirement	sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006	Business Support Officer

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	Electronic Equipment Starter Checklist	EE Starter checklist form filled out by line mgr prior to new member joining	N	N	N	N	N	Name, job title, contract type	N	Setting new member up on email, internet, access to various 'drives' on the WTHWT electronic system	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Media Consent Form	Form	N	N	N	N	N	Name, job role	N	Get the permission of employee who may appear in a photograph, video or webcam image	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Statutory requirement	Data Protection Act 1998	Business Support Officer
	Personnel Files	various items	Y	Y	Y	Y	Y		Y	various dependent on item - personnel file is a general repository for individual employee's information.	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Training Records	receipt of training certificates, or (for in-house training), on attendance register	N	N	N	N	N	Name, job role	N	Recording training undertaken by employee, including statutory training (i.e. H&S)	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Sickness Absence - Self Certification	WT HWT Form	N	N	N	Y	N	Name, job role, previous absence dates	N	Recording sickness absence for a range of reasons including taking reasonable care of the employee, tracking occupational sick pay, sickness absence trends across the Trust.	It is advisable to keep records for at least 3 months after the end of the period of sick leave in case of a disability discrimination claim. However if there were to be a contractual claim for breach of an employment contract it may be safer to keep records for 6 years after the employment ceases.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Sickness Absence - Return to Work information	WT HWT Form	N	N	N	Y	N	Name, job role, previous absence dates	N	Line Manager to carry out return to work assessment.	It is advisable to keep records for at least 3 months after the end of the period of sick leave in case of a disability discrimination claim. However if there were to be a contractual claim for breach of an employment contract it may be safer to keep records for 6 years after the employment ceases.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Statutory Sick pay records	WT HWT Form	N	N	N	Y	N		N	Number of days SSP in accordance with SSP rules.	It is advisable to keep records for at least 3 months after the end of the period of sick leave in case of a disability discrimination claim. However if there were to be a contractual claim for breach of an employment contract it may be safer to keep records for 6 years after the employment ceases.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Fit Notes (from GPs)	Fit note supplied to employee by GP who in turn provides to HR	Y	Y	N	Y	N	N	N	to determine eligibility for occupational sick pay/SSP, information to assist with managing the employee's medical condition at work.	It is advisable to keep records for at least 3 months after the end of the period of sick leave in case of a disability discrimination claim. However if there were to be a contractual claim for breach of an employment contract it may be safer to keep records for 6 years after the employment ceases.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Staff photographs	Photo taken upon joining	N	N	N	N	N	N	Y	For adding to employees' electronic record on the online HR solution (currently HR Manager)	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Maternity Leave & pay calculations & records including Mat B1 forms	Notification by expectant mother, Mat B1 forms, Mat leave calculator	Y	Y	N	Y	N		N	Maternity leave calculation; maternity pay calculation	3 years after the end of the tax year in which the maternity period ends.	Statutory requirement	The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960) as amended	Business Support Officer
	Paternity Leave applications, and pay calculations and records	Paternity leave application form, Paternity leave calculator	Y	Y (of infant)	N	N	N		N	Consideration/decision re application	5 years from birth/adoption of the child or 18 years if the child receives a disability allowance	Statutory requirement	The Statutory Paternity Pay and Statutory Adoption Pay (General) Regulations 2002	Business Support Officer
	Shared Parental Leave applications, salary calculations, and records	Shared parental leave application form, calculator	Y	Y (of infant)	N	N	N		N	To assess application for approval, and to calculate salary if appropriate	3 years after the end of the tax year in which the maternity period ends.	Statutory requirement	The Shared Parental Leave Regulations 2014	Business Support Officer
	Parental Leave applications, calculations, and records	Application form, notes of calculations	Y	Y (of infant)	N	N	N		N	Calculating entitlement, recording for eligibility for future requests	5 years from birth/adoption or 18 years if the child is disabled	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Adoption Leave applications, salary calculations, and records	Application form, salary calculations and records	Y	N	N	N	N		N	To assess application for approval, and to calculate salary if appropriate	3 years after the end of the tax year in which the maternity period ends.	Statutory requirement	The Statutory Paternity Pay and Statutory Adoption Pay (General) Regulations 2002	Business Support Officer
	Flexible Working Requests	Flex Working Application Form	Y	N	N	N	N		N	Processing requests	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Senior Executives' records (that is, those on a senior management team).	Various - recruitment documents, sickness records, OH records etc as above	Y	Y	Y	Y	N	As above in the various HR/H&S categories	N	HR/H&S Records	Permanently for historical purposes. CIPD	Legitimate interest	CIPD HR Keeping Records Factsheet	CEO
	Redundancy details, score sheets, interview notes	Score sheets, interview notes	Y	Y	N	N	N		N	To select employees for redundancy or transfer to alternative suitable position.	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Exit Interview Form	Exit Interview Form	Y	N	N	N	N		N	To gain feedback about the exiting employee's time at the Trust	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Disciplinary records: investigations, interviews etc	Investigation Forms, notes etc. Letters regarding disciplinary procedure/action.	Y	N	N	N	N		N	To examine incidents etc; performance records	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Grievance details: grievance form, investigation notes, interview notes	Grievance Form/letter; Investigation Forms, notes etc. Letters regarding grievance procedure/outcome.	Y	N	N	N	N		N	To examine/investigate grievance to reach a resolution.	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer
	Performance & Development Reviews	PDR Forms	Y	N	N	Perhaps	N		N	To carry out performance and development appraisal; to carry out self review.	6 years after employment ceases. This is in order to cover time limit for bringing any civil legal action.	Legitimate interest	CIPD HR Keeping Records Factsheet	Business Support Officer