

Appendix 1: Lawful Basis for Processing Personal Data and Retention Periods

Record Type	Retention Period	Lawful Basis for Processing the Personal Data	Lawful basis for processing special categories of personal data
Unsuccessful applications.	6 months	Article 6 (1) (b) - necessary for the performance of a contract	n/a
Timesheets	2 years		
Roster	6 years		
Salaries paid to staff	10 years		
Staff Record - this includes (but is not limited to) evidence of right to work, security checks, training records and recruitment documentation for the successful candidate including job adverts and application forms.	May be destroyed 6 years after the staff member leaves or the 75th birthday, whichever is sooner, if a summary has been made.	Article 6 (1) (b) - necessary for the performance of a contract	<p>Article 9 (2) (b) - necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law</p> <p>Article 9 (2) (f) necessary for the establishment, exercise or defence of legal claims</p> <p>Article 9 (2) (h) - necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services</p>
Staff Record Summary	6 years after the staff member leaves		
Health assessments including reports from Occupational Health	Keep until 75th birthday or 6 years after the staff member leaves whichever		
Occupational Health Report of Staff member under health surveillance where they have been subject to radiation doses	50 years from the date of the last entry or until 75th birthday, whichever is longer		
Exposure monitoring information	40 years/5 years from the date of the last entry made in it		
Industrial relations including tribunal case records	10 years		
Fraud case files	6 years	Data Protection Act 2018 Schedule 1, Part 2, Paragraph 10 – Preventing or detecting unlawful acts	Data Protection Act 2018 Schedule 1, Part 2, Paragraph 10 – Preventing or detecting unlawful acts
Litigation records	10 years	Article 6 (1) (c) - processing is necessary for compliance with a legal obligation	Article 9 (2) (f) necessary for the establishment, exercise or defence of legal claims

Subject Access Requests	3 years or where an appeal has been made, 6 years		Data Protection Act 2018 Schedule 1, Part 2, Paragraph 6 (2) (a) - necessary for the exercise of a function conferred on a person by an enactment or rule of law
Incidents	Incidents (serious) – 20 years Incidents (not serious) -10 years		Article 9 (2) (h) - necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services
Employee surveys	Feedback is anonymised	Article 6 (1) (f) necessary for legitimate interests for the purposes of capturing your views as an employee, benchmarking and to allow us to implement changes in response to anonymised feedback	n/a
COVID-19 Consent Forms	6 years	Article 6(1)(a) – you have given consent for us to process your personal data for a specific purpose	Article 9(2)(a) – you have given your explicit consent to the processing of your special category personal data
Media relations activities	6 years from the date the material was last used	Article 6 (1) (f) necessary for legitimate interests for the purposes of publicity, marketing, educational and journalistic purposes of GenesisCare	n/a