Data Retention Policy

Issued by: Clarence Recruitment ("the Company")
Date: August 2026
Review Cycle: Annual, or sooner where required

1. Policy Statement

Clarence Recruitment is committed to ensuring that personal data is retained only for as long as necessary to meet business, legal, regulatory, safeguarding, financial and contractual requirements. Personal data must be securely deleted, destroyed or anonymised in accordance with UK GDPR, the Data Protection Act 2018 and ICO guidance.

2. Purpose

Ensure compliance with data protection legislation, support safeguarding obligations, provide clear retention guidelines and ensure secure disposal of information.

3. Scope

Applies to all employees, directors, temporary workers, consultants and contractors and all personal data held electronically or in paper format.

4. Retention Principles

Retain data only where necessary, review records periodically, keep information secure, and ensure safeguarding-related records are not deleted without appropriate authorisation.

5. Candidate Data Reviews

Inactive candidate records should be reviewed and updated, archived, anonymised or securely deleted where appropriate. Records relating to safeguarding concerns, allegations, DBS matters, suitability concerns or investigations must not be deleted without approval.

6. Secure Storage

Use approved systems, strong passwords, restricted access controls and secure physical storage.

7. Secure Disposal

Electronic records must be permanently deleted and paper records cross-cut shredded or destroyed through an approved confidential waste provider.

8. Safeguarding Record Retention

Records relating to safeguarding concerns, low-level concerns, allegations, child protection matters, DBS referrals, TRA referrals and suitability assessments may be retained beyond normal retention periods where required to protect children, vulnerable adults or meet legal and regulatory obligations.

9. Legal, Regulatory and Safeguarding Holds

Scheduled deletion must be suspended where records may be relevant to litigation, safeguarding investigations, DBS or TRA matters, insurance claims or regulatory investigations.

10. Staff Responsibilities

All staff must follow this policy, protect personal data, adhere to retention requirements and report concerns immediately.

11. Policy Review

This policy will be reviewed annually or sooner if legislation, ICO guidance or safeguarding requirements change.

12. Retention Schedule

Record Type	Retention Period
Candidate registration/CVs	2 years from last meaningful contact
Placement and assignment records	6 years after engagement ends
Right to Work documents	Engagement plus 2 years
DBS certificate copies	Maximum 6 months unless lawful reason exists
Safeguarding concerns	Minimum 6 years after resolution and longer where required
Allegations against workers	Minimum 10 years after resolution or longer if required
TRA investigations	Minimum 10 years after closure
Personnel files	6 years after employment ends
Client contracts	6 years after termination
Financial records	6 years

Policy Owner: Mia Jones, Head of Business Services & Governance
Next Review Date: August 2027