
Data Retention Policy

March 2026

Data Retention Policy

1. Purpose

The purpose of this Data Retention Policy is to ensure that Danny Sullivan Group retains personal and business data only for as long as necessary to fulfil legal, regulatory, and operational obligations.

This policy ensures compliance with the UK GDPR storage limitation principle, which requires organisations to retain personal data only for as long as necessary for the purposes for which it was collected.

Danny Sullivan Group provides recruitment services across the United Kingdom, supplying skilled labour workers across a range of sectors and may process data relating to both UK and international workers.

2. Scope

This policy applies to all employees of Danny Sullivan Group Limited (DSG) and its subsidiaries (Danny Sullivan & Sons Ltd, Diamond Construction & Engineering Recruitment Limited, and Danny Sullivan Group Academy Limited), contractors, workers, agency workers, volunteers, visitors any third party with access to our IT systems or data.

This policy applies to all personal and business data held by Danny Sullivan Group, including data relating to:

- Job applicants and candidates
- Temporary workers and contractors
- Clients and hiring organisations
- Employees
- Suppliers and professional partners

The policy applies to data stored in:

- Recruitment and candidate management systems
- HR systems
- Payroll systems
- Email and communication platforms
- Cloud storage systems
- Physical documentation and archives
- Backups and archived data

3. Retention Principles

Danny Sullivan Group follows the following principles when retaining data:

- Data will only be retained where there is a legitimate legal, contractual, or operational reason.
- Personal data will not be kept longer than necessary.

- When retention periods expire, data will be securely deleted, destroyed, or anonymised.
- Access to retained records will be restricted to authorised personnel only.
- Regular reviews of stored data will be conducted to ensure compliance.

4. Data Retention Schedule

DATA	REASON	RETAIN FOR
Finance Data	HMRC compliance and tax records	6 years plus current financial year (7 years total)
Employee Records	Employment tribunal risk and personal injury claims	3 years plus current year (4 years total)
Payroll Data	Tax reporting and audit purposes	7 years
Client Data	Contractual, tax, and audit purposes	7 years

5. Health & Safety Documentation

Where Danny Sullivan Group supplies workers to industries requiring documented safety procedures, health and safety records must be retained for auditing and compliance purposes.

HEALTH & SAFETY DATA	RETENTION PERIOD
Audits	Until the document is 3 years older than its original date
Safety Manuals	Until the document is 3 years older than its original date
Personal Files (including induction packs)	Until the document is 3 years older than its original date
Quality Information (HSQE Director specific)	Until the document is 3 years older than its original date
Risk Assessments	Until the document is 3 years older than its original date
Safety Briefs	Until the document is 3 years older than its original date
Safety Meeting Minutes	Until the document is 3 years older than its original date
Annual Health & Safety Reports	Until the document is 3 years older than its original date
Safety Validation Assessments	Until the document is 3 years older than its original date
Accident / Incident Reports	Until the document is 3 years older than its original date
Road Traffic Accidents	Until the document is 3 years older than its original date

6. Occupational Health and Insurance Records

Certain records relating to worker health and insurance must be retained for extended periods due to potential long-term claims.

DATA	REASON	RETAIN FOR
Occupational Health Records	Legal compliance and long-term health monitoring	40 years
Employer Liability Insurance Records	Potential long-term compensation claims	40 years

7. Candidate and Worker Recruitment Data

As a recruitment agency supplying skilled labour, Danny Sullivan Group maintains records relating to candidates and temporary workers.

DATA	REASON	RETAIN FOR
Candidate CVs and registration data	Recruitment matching and job placement	2 years after last contact
Right-to-Work Documentation	Legal compliance and audit requirements	2 years after employment ends
Worker placement records	Contractual records and dispute resolution	6 years
References and vetting documentation	Verification of skills and employment history	2 years after last contact

Where candidates consent to remain in the Danny Sullivan Group's recruitment database for future opportunities, records may be retained longer but will be reviewed periodically.

8. Data Disposal

When the retention period expires, data will be securely disposed of.

Methods may include:

- Permanent deletion from digital systems
- Secure shredding of physical documents
- Secure wiping of storage devices
- Anonymisation where full deletion is not possible

All disposal methods will ensure personal data cannot be reconstructed.

9. Responsibilities

Management

- Ensure systems are in place to comply with this policy.

HR Department

- Manage employee data retention.

Finance Department

- Maintain financial and payroll record retention.

Health & Safety Personnel

- Ensure safety documentation retention requirements are met.

All Staff

- Ensure records are handled and disposed of according to this policy.

10. Policy Review

This policy will be reviewed **annually** or when significant changes occur in:

- legislation
- regulatory guidance
- company operations



Russell Deards
General Counsel & Company Secretary
1st March 2026