



KMP – 027 GHL Data Retention Policy

GHL DATA RETENTION POLICY

Retention of Data

Group Horizon Ltd (GHL) will keep some forms of information for longer than others. Because of storage problems, information about students cannot be kept indefinitely, unless there are specific requests to do so. In general, information about students will be kept for a minimum of 6 years after they leave their programme.

This will include: -

- Name and address
- Learning agreements
- Academic achievements, including marks for course work and
- Copies of any reference written

All other information, including any information about health or disciplinary matters will be destroyed within twelve months of the course ending and the student leaving.

Safeguarding/ Child Protection case files must be kept until the subject is aged 25 years old. (If applicable)

GHL has a responsibility to maintain its records and systems considering:

- The most efficient and effective way of storing confidential information
- The confidential nature of the information stored
- The security of the record systems used
- Privacy and disclosure
- Accessibility

GHL will need to keep information about staff for longer periods of time. In general, all information will be kept for seven years after a member of staff leaves the Company. Some information however, will be kept for much longer. This will include information necessary in respect of pensions, taxation, potential or current disputes or litigation regarding the employment, and information required for job references.

Data Protection

This policy sets out how long employment-related and learner data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the General Data Protection Regulation (GDPR) and the Freedom of Information Act 2000. Data will be stored and processed to allow for the efficient operation of the company. The company's Data Protection Policy outlines its duties and obligations under the GDPR

Archive Storage and Retrieval

Documents where possible will be stored in a way that environmentally sustainable, preserves their integrity and readability and restricts access to appropriate individuals only.

Upon a request from an external agency GHL may make available for access to the requested records. Any transfer of ownership of the data or of the documents shall be documented. The new owner shall assume responsibility for archiving.

Access to archives shall be restricted to the named individuals responsible for the archives. The media used to store essential documents shall be such that those documents remain complete and legible throughout the required period of retention and can be made available upon request. Any alteration of records should be traceable.

All essential documents should be boxed and labelled with the contract reference number, any course reference, the date they were archived, and date to be destroyed (if available).

The MIS Officer should maintain a record of details of archived essential documents.

Records should include details of:

- the contract reference,
- archiving location and
- person authorised to access these documents,
- the date they were archived, and
- date to be destroyed (if available).

The documents are archived with an external provider:

Quicksilver

Ponteland Road
Lily Estate
NEWCASTLE UPON TYNE, NE15 9EP

Destruction of records

Where records have been identified for destruction they should be disposed of in an appropriate way. 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.

All paper records containing personal information, or sensitive policy information should be shredded before disposal where possible. All other paper records should be disposed of by an appropriate waste paper merchant. All electronic information will be deleted

GHM maintains a database of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record in this list at least: -

- File reference (or another unique identifier);
- File title/description;
- Number of files; and

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- Name of the authorising officer.

Conclusion

The documentation held will be kept in line with the Freedom of Information Act 2000 (Amended 2007) (FOI) and the Data Protection Act 1998 (DPA).

Compliance with the 1998 Act is the responsibility of all employees of the Company. Any deliberate breach of the data protection policy may lead to disciplinary action being taken, or access to GHIL facilities being withdrawn, or even a criminal prosecution. Any questions or concerns about the interpretation or operation of this policy should be taken up with the relevant Company Director.

Table of Records

Type of record	Format	Retention period	Comments
Exam results	Paper Electronic	6 year – paper based 10 years - electronic	If applicable
Coursework/Portfolios	Paper copies	As required, up to 3 years	Held in storage If applicable
Enrolment and Learner Record documents (except ESF)	Paper as well as electronic	6 year – paper based 10 years - electronic	Paper copies held with Quicksilver
Student attendance/registers	Paper as well as electronic	6 year – paper based 10 years - electronic	Paper copies held with Quicksilver
MIS statistical reports	Electronic	3 years	Available online for longer period
Additional Learning Support records	Paper and Electronic	Retained for 6 years	This covers learning support records – if applicable
Financial Records	Paper and Electronic	Electronic indefinitely. Paper 6 years	This covers all invoices
2007-13 round of European Social Funding (ESF)	Paper and Electronic	Retained until 31 December 2022	GHIL must retain all documents necessary to verify the services provided

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			to funding partners
2014-20 round of European Social Funding (ESF)	Paper and Electronic	Retained until 31 December 2030	GHL must retain all documents necessary to verify the services provided to its main funding partners
Staff Records			Paper records kept in HR.
Job applications – interview records of unsuccessful candidates	Paper and Electronic	Six months after notifying unsuccessful candidates, unless the school has applicants' consent to keep their CVs for future reference. In this case, application forms will give applicants the opportunity to object to their details being retained	
Job applications and interview records of successful candidates	Paper and Electronic	Six years after employment ceases	
Written particulars of employment, contracts of employment and changes to terms and conditions	Paper and Electronic	Six years after employment ceases	
Right to work documentation including identification documents	Paper and Electronic	Two years after employment ceases	
Immigration checks	Paper and Electronic	Two years after the termination of employment	If applicable
DBS checks and disclosures of criminal records forms	Paper and Electronic	As soon as practicable after the check has been completed and the outcome recorded (i.e. whether it is satisfactory or not) unless in exceptional circumstances (for example to allow for consideration and resolution of any disputes or complaints) in which case, for	

		no longer than 6 months. Change	
Change of personal details notifications	Paper and Electronic	No longer than 6 months after receiving this notification	
Emergency contact details	Paper and Electronic	Destroyed on termination	
Personnel and training records	Paper and Electronic	While employment continues and up to six years after employment ceases	
Annual leave records	Paper and Electronic	Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year	
Consents for the processing of personal and sensitive data	Paper and Electronic	For as long as the data is being processed and up to 6 years afterwards	
Disciplinary and training records	Paper and Electronic	6 years after employment ceases	
Allegations of a child protection nature against a member of staff including where the allegation is founded	Paper and Electronic	10 years from the date of the allegation or the person's normal retirement age (whichever is longer). This should be kept under review. Malicious allegations should be removed	
Financial and Payroll Records			External Organisation
Pension Records	Paper and Electronic	12 years	
Payroll and wage records	Paper and Electronic	6 years after end of tax year they relate to	
Maternity/Adoption/Paternity Leave records	Paper and Electronic	3 years after end of tax year they relate to	
Statutory Sick Pay	Paper and Electronic	3 years after the end of the tax year they relate to	
Current bank details	Paper and Electronic	No longer than necessary	

Heath & Safety Documents			Held in Head Office
Health and Safety consultations		Permanently	If applicable
Health and Safety Risk Assessments		3 years from the life of the risk assessment	
Any reportable accident, death or injury in connection with work		For at least twelve years from the date the report was made	
Accident reporting		Adults – 6 years from the date of the incident Children – when the child attains 25 years of age.	If applicable
Fire precaution log books		6 years	
Medical records and details of: - <ul style="list-style-type: none"> • control of lead at work • employees exposed to asbestos dust • records specified by the Control of Substances Hazardous to Health Regulations (COSHH) 		40 years from the date of the last entry made in the record	If applicable
Records of tests and examinations of control systems and protection equipment under COSHH		5 years from the date on which the record was made	