

Data Retention Policy

Retention, review, deletion and secure disposal of records

Policy owner	Eleanor McInerney, Compliance and Candidate Lead
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1. Purpose

This policy sets out how long Certus Education should retain different categories of information and the principles used to determine retention periods. Personal information must not be retained indefinitely without a lawful reason. Records should be deleted, anonymised or securely disposed of when the applicable retention period ends, subject to legal holds and other exceptions.

2. Retention schedule

The schedule below reflects the periods and legal references contained in the supplied source policy. Where a longer statutory, regulatory, contractual or litigation-related period applies, the longer lawful period should be followed.

Record group	Examples	Certus retention period	Source / compliance basis
Personnel records	Work-seeker records: applications/CVs, ID checks, terms of engagement, assignment details, opt-out notices and interview notes	5 academic years from last engagement	Conduct Regulations: at least 1 year from last work
Client / hirer records	Client details and terms of business	5 academic years from last engagement	Conduct Regulations: at least 1 year from last work
Engagement / business terms	Terms of engagement with temporary workers and terms of business with clients	5 academic years from last engagement	Limitation Act: 6 years
Appraisal / assessment	Annual appraisal and assessment records	2 academic years from last engagement	Data protection: no longer than necessary
References	References and related records	5 academic years from last engagement	Conduct Regulations: at least 1 year from last work
Right to work	Records relating to right-to-work checks	5 academic years from last engagement	Conduct Regulations: at least 1 year from last work
Criminal / DBS checks	Criminal records and Disclosure and Barring Service checks	5 academic years from last engagement	Conduct Regulations: at least 1 year from last work
National Minimum Wage	Pay, hours, overtime/shift premiums, accommodation deductions/payments, absences, holiday, travel/training and related pay-reference information	3 years after the end of the relevant pay reference period	HMRC / National Minimum Wage Act 1998
Statutory sick pay	Sickness records supporting statutory sick pay	3 years after the end of the relevant pay reference period	HMRC
Statutory family pay	Statutory maternity, paternity and adoption pay records	3 years from the end of the relevant tax year	HMRC
Pensions auto-enrolment	Auto-enrolment dates, joining records, opt-in/opt-out notices and contributions	6 years; opt-out notices 4 years	HMRC
Gender pay gap	Gender pay gap reporting records	1 year; published statement retained online for 3 years	HMRC

Record group	Examples	Certus retention period	Source / compliance basis
VAT	VAT records	6 years	HMRC
Company accounts	Company accounts	6 years	HMRC
Payroll / CIS	Payroll information and CIS records	3 years from the end of the relevant tax year	HMRC
ITEPA / intermediaries	Records relating to intermediaries legislation	At least 3 years after the end of the relevant tax year	HMRC

3. End of the retention period

At the end of the applicable retention period, records should be reviewed. Personal data should then be securely deleted or anonymised, and physical or electronic disposal should be performed in a way that prevents unauthorised reconstruction or recovery.

4. Legal holds and exceptions

A record must not be destroyed where it is subject to a legal hold, investigation, complaint, safeguarding matter, audit, regulatory requirement, litigation or another legitimate reason requiring continued preservation. The reason for extending retention should be recorded where appropriate.

5. Accountability and review

Managers and staff are responsible for following the schedule relevant to the records they handle. Certus Education's Compliance and Candidate Lead oversees data protection compliance and may amend retention arrangements where legislation or regulatory guidance changes.

Document control

Item	Detail
Policy date	1 May 2026
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