

# CB Training Services Limited

## Retention Policy



### Overview

The data retention rates below are based upon no requests being received to remove the data earlier.

The data retention periods for those who request withdrawal are detailed below.

#### **Swim School Lessons**

- For 7 financial years after the last enrolment from a swimmer within an account.
- For example, should a child stop swimming with us in December 2017 this is in the 2017 to 2018 financial year and so 7 years after this would be April 2025.

#### **Training Course Enrolment**

- For 5 financial years after the course is completed in accordance with an Awarding Body retention rates.
- For example, should your course be in June 2017 this is in the 2017 to 2018 financial year and so 5 years after this would be April 2023.

#### **Employees—pay information**

- Bank information is removed within 90 days of a P45 being generated
- Pay slips, contracts of employment, qualifications and all other personal information is removed 7 financial years after employment ends.
- For example, should your employment be terminated in April 2018 this is the 2018—2019 financial year and so 7 years after this would be April 2026.
- HR matters (e.g. disciplinary records) will be destroyed within 90 days of them expiring as detailed on the initial letter.

#### **Financial Records**

- All financial information (invoices, quotations, payment records etc.) are kept for 7 years after the end of the financial year with which they relate to.

### For those who request earlier withdrawal

#### **Swim School Lessons**

- We will look to remove all information within 30 days of the request being received. However, where information is stored on third party systems (e.g. our Booking System Database) information will be supplied to the Data Subject on how to follow this up and request removal from those systems if CB Training Services Limited is unable to remove it.

## **Course Enrolment**

- We will look to remove all information within 30 days of the request being received. However, where information is stored on third party systems (e.g. our Awarding Bodies) information will be supplied to the Data Subject on how to follow this up and request removal from those systems.

## **Employees—pay information**

- Data can only be removed once an employee is no longer employed by the company and after all legal obligations have been fulfilled (for example after the end of the tax year).
- Where this is the case we will aim to remove all records permissible by law within 30 days. Any other pieces of information which need to be retained (e.g. financial records) will be detailed in our response to the Data Subject.

## **Financial Records**

- All records can only be removed after it is no longer a requirement to keep the information for tax reasons (e.g. 7 years after the end of the financial year in which the payments relate).
- Where a request comes before this time period is reached all other pieces of information will be removed and the Data Subject informed in our response.

## **Summary**

Procedure For all storage media (electronic and hard copy records), CB Training Services Limited retains means to access that data.

The Data Protection Officer (DPO) is responsible for destroying data once it has reached the end of the retention period as detailed on the previous page.

All data is checked for its destruction deadline at the end of each financial year.

Destruction must then be within 90 days of this date. This means that using the examples on the previous page when the retention period is reached each April it will be destructed within 90 days of this date.

Destruction is handled by the information being securely deleted and, if remotely stored, removed from backup mediums.

## **Monitoring and Review**

This policy and its procedures will be reviewed regularly for improvements as part of our Quality Assurance requirements. This will ensure it is fit for purpose, reflects the services we deliver to our customers and we provide services which are relevant to the requirements of individual needs.

This policy was written and created by Chris Bateman in July 2018 (Version 18.1).

This policy will be reviewed at least once per year and when there is an update from the awarding organisation policies.

Review no.	Date of review:	Purpose & Details of change	Initial
21.1	08.12.2021	Full review and no changes required	CB
23.1	02.03.2023	No changes required	CB
24.1	31.03.2023	No changes required	CB

Next Review Date: March 2025