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# Data Retention Policy

## 1. Purpose

Theorise Ltd is committed to ensuring that personal data is retained only for as long as necessary and is securely disposed of when no longer required.

The purpose of this policy is to:

- Ensure compliance with UK GDPR and the Data Protection Act 2018.
- Support legal, regulatory and contractual obligations.
- Promote secure management of personal information.
- Ensure information is retained for appropriate periods.
- Reduce the risks associated with excessive or unnecessary retention of personal data.

This policy should be read alongside Theorise Ltd's Data Protection Policy and Privacy Notices.

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## 2. Scope

This policy applies to:

- Directors
- Employees
- Support Staff
- Agency Workers
- Self-Employed Consultants
- Contractors
- Temporary Workers
- Volunteers

The policy applies to all personal data, special category data and company records held in paper or electronic format.

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### **3. General Principles**

Theorise Ltd will:

- Retain information only for as long as necessary.
- Comply with applicable legal and regulatory requirements.
- Maintain accurate and secure records.
- Ensure information is disposed of securely when retention periods expire.
- Review retained information periodically.

Where information is subject to ongoing legal proceedings, investigations, safeguarding concerns, complaints or regulatory enquiries, retention periods may be extended where appropriate.

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### **4. Individual Rights**

Individuals have rights under UK GDPR, including:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights relating to automated decision-making.

Requests relating to personal data should be directed to:

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**Dany Brunton**

Director and Data Protection Lead

[dany@theorise ltd.com](mailto:dany@theorise ltd.com)

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**5. Storage and Disposal of Records**

Theorise Ltd will ensure that records are:

- Stored securely.
- Protected against unauthorised access.
- Accessible only to authorised individuals.
- Disposed of securely when no longer required.

Electronic records will be permanently deleted where appropriate.

Paper records will be securely shredded or destroyed.

Theorise Ltd will process, store, archive and dispose of information in accordance with its Data Protection Policy and Information Security arrangements.

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**6. Retention Schedule**

**Student Records**

<b>Record Type</b>	<b>Retention Period</b>
Student Support Funding Documentation (including Award Letters)	5 years from the end of support provision
Student Contact Information	5 years from the end of support provision
Student Support Records and Session Records	5 years from the end of support provision
Student Correspondence	5 years from the end of support provision
Student Complaints and Investigations	6 years from closure

**Record Type**

**Retention Period**

Student Safeguarding Records	Minimum 6 years from closure of the concern or longer where required
Student Feedback Forms and Evaluations	3 years

**Support Staff Records**

**Record Type**

**Retention Period**

Support Staff Personnel Records	6 years after engagement ends
Right to Work Documentation	Duration of engagement plus 2 years
Training Records	6 years after engagement ends
Disciplinary and Conduct Records	6 years after engagement ends
Performance Management Records	6 years after engagement ends
Assignment Records	6 years after engagement ends
Timesheets and Payment Records	6 years

**Recruitment Records**

**Record Type**

**Retention Period**

Successful Applicant Records	Incorporated into personnel records
Unsuccessful Applicant Records	6 months from recruitment decision
Recruitment Documentation and Interview Notes	6 months from recruitment decision
Recruitment Correspondence	6 months from recruitment decision

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### Financial Records

Record Type	Retention Period
Accounting Records	6 years
HMRC Records and Correspondence	6 years
Wage and Salary Records	6 years
National Insurance Records	6 years
Expenses Records	6 years
VAT Records	6 years

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### Health and Safety Records

Record Type	Retention Period
Accident Records	3 years from date of last entry
Accident Records Involving Young Adults	Until age 21
Health and Safety Incident Reports	6 years
Lone Working Incident Reports	6 years
Risk Assessments	Duration of use plus 3 years

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### Corporate Records

Record Type	Retention Period
Contracts and Service Agreements	6 years after expiry
Complaints Records	6 years after closure
Policy Review Records	6 years
Insurance Documentation	6 years after expiry
Regulatory Correspondence	6 years

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<b>Record Type</b>	<b>Retention Period</b>
<b>Board or Director Records</b>	Permanently where required for corporate history

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### **General Correspondence**

<b>Record Type</b>	<b>Retention Period</b>
Operational Emails and Correspondence	Retained in accordance with the retention period applicable to the underlying matter
Marketing Communications Consents	Duration of consent plus 2 years
General Enquiries	2 years

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### **7. Exceptions to Retention Periods**

Information may be retained beyond the stated retention period where necessary:

- To comply with legal obligations.
- For ongoing litigation or anticipated legal proceedings.
- For safeguarding purposes.
- For regulatory investigations.
- For audit requirements.
- Where otherwise permitted or required by law.

Any decision to extend retention periods will be proportionate and appropriately documented.

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### **8. Monitoring and Review**

Theorise Ltd will periodically review retained records to ensure:

- Information remains necessary.
- Retention periods remain appropriate.

- Information is disposed of securely when no longer required.
  - Legal and regulatory requirements continue to be met.
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### 9. Policy Review

Item	Details
Policy Owner	Dany Brunton
Approved By	Director
Version	Version 2.0
Last Reviewed	26/05/2026
Next Review Date	26/05/2027
Review Frequency	Annually