

# Data Retention Policy

## Introduction

This document outlines the policy of **Impress the Examiner Ltd** (“the Company” “we”) covering the retention of personal data collected, held and processed by the Company in accordance with the Data Protection Act 2018 and the General Data Protection Regulations (together forming “the Legislation”).

The Company only ever retains records and information for legitimate or legal business reasons and complies fully with the Legislation.

## Purpose

This Policy sets out the Company’s approach to managing its personal data, the periods for which that data is to be retained, and its approach to ensuring data is not retained for any longer than necessary.

## Scope

This policy applies to all persons within the Company (meaning permanent, fixed term, temporary staff and sub-contractors engaged by or with the Company). Adherence to this policy is mandatory and non-compliance could lead to disciplinary or contractual action.

## About the data we collect

The Company needs to collect personal information about job applicants, the people we employ, work with or have a business relationship with, and about the students we tutor to effectively and compliantly carry out our everyday business functions and activities, and to provide our services. This information can include but is not limited to: name and contact details, identification numbers, private and confidential information, sensitive information, bank details and assessments.

In addition, we may occasionally be required to collect and use certain types of personal information to comply with the requirements of the law and/or regulations; however we are committed to collecting, processing, storing and destroying all information in accordance with the Legislation and any other associated legal or regulatory body rules or codes of conduct that apply to our business and/or the information we process and store.

## Storage and access

The Company’s data is stored remotely and accessed by authorised personnel only. Personal information is accessible on a need-to-know basis only.

Student data generated by the Company for our clients during the course of client contracts is fully transferred to the client on completion of the contract. Some anonymised data may be retained by the Company for monitoring and quality control purposes.

Once the retention period has elapsed, the data is reviewed then archived, deleted or confidentially destroyed according to the schedule below.

## Destruction and disposal

The Company is committed to the secure and safe disposal of any confidential waste in accordance with our contractual and legal obligations, and in an ethical and compliant manner. We confirm that our approach and procedures comply with the laws and provisions made in the Legislation and that staff are trained and advised accordingly on the procedures and controls in place.

Information disposal is subject to the requirements of any legal action, investigation or current data subject access request.

## Retention periods

In line with the Legislation, the Company will not retain data for any longer than necessary in light of the purpose(s) for which that data is collected, held and processed.

For all personal information obtained, used and stored within the Company, we:

- Carry out periodical reviews of the data retained, checking purpose, continued validity, accuracy and requirement to retain;
- Establish and verify retention periods for the data, with special consideration given to:
  - the type of personal data
  - the categories of data subjects
  - the requirements of the Company
  - the purpose of processing
  - lawful basis for processing.

Where it is not possible to define statutory or legal retention periods for data, we will assess suitable retention periods based on common practice within the sector and the requirements of the Company to properly carry out its business.

## Requests for erasure

In specific circumstances data subjects have the right to request that the Company erase their personal information. However we recognise that this is not an absolute 'right to be forgotten'.

Data subjects only have a right to have personal data erased and to prevent processing if one of the below conditions applies:

- The personal data is no longer necessary in relation to the purpose for which it was originally collected/processed;
- The individual withdraws consent and consent was the original lawful basis for the processing;
- The individual objects to the processing and there is no overriding Company legitimate interest for continuing the processing;
- The personal data was unlawfully processed;
- The personal data must be erased in order to comply with a legal obligation.

## Compliance and monitoring

The Company is committed to ensuring continued compliance with this policy and the Legislation, and undertakes regular audits and monitoring of the information we hold, its management, archiving and retention.

# Retention Schedule

Document Type Retention Period

## *Accounting and Finance*

Accounts Payable	7 years
Accounts Receivable	7 years
Annual Financial Statements and Audit Reports	Permanent
Employee/Business Expense Reports/Documents	7 years
General Ledger	7 years
Interim Financial Statements	7 years
HMRC documentation and correspondence	Permanent
Tax returns	7 years

## *Legal, Contracts, GDPR registers*

Contracts, related correspondence and other supporting documentation	7 years
Legal correspondence	Permanent
Subject Access Request log forms (SAR Register)	2 years after last action related to SAR

## *Client schools*

Student data (usually but not always anonymised)	6 weeks post end of service
Tutor assessments and grades	Duration of student's time in school
Student survey and service feedback	Duration of school and/or tutor contract
General correspondence	2 years

## *Personnel (staff and contractors)*

Tutoring contractor contact details	7 years post last engagement
Tutor DBS check	Duration of tutor remaining on our books. Deleted within 1 month of tutor ceasing to work for us.
Tutor photo	Duration of tutor remaining on our books. Deleted within 1 month of tutor ceasing to work for us.
Other contractor records	3 years after contract termination

## *Recruitment*

### *Successful candidates*

CV, DBS number	3 years post last engagement
DBS check information, Teacher Recruitment number	1 month maximum
Disability details	3 years post last engagement

### *Unsuccessful candidates*

CV	1 year
Name, contact details, right to work in UK	1 month post failed interview

### *Waiting list candidates*

Name, contact details	3 years
General recruitment correspondence	2 years

## *Marketing*

Data stored under Consent legal basis including website contact form	2 years or 30 days maximum following opt-out
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