

DATA RETENTION POLICY

DATA RETENTION POLICY

Date of Policy	28/06/2024
Policy Review Date	27/06/2025
Review Cycle	At least annually
Policy Author	Romilly Wakeling

1. Introduction

This Data Retention Policy is designed primarily to set out the limits that apply to the various types of data held by Dunbar Education, to establish the criteria by which those limits are set and to set out how personal data should be deleted or disposed of.

Dunbar Education will keep some forms of information for longer periods than others. Information should not be kept indefinitely unless there are specific requirements to do so. In line with Dunbar Education's Data Protection policy information should not be kept longer than is necessary. The table below gives a breakdown of timescales for the retention of various types of information and any legal or regulatory requirements applicable.

Section	Records Held (Type of Data)	Retention Timescale (in years)	Retention complies with
Personnel Records	Work-seeker records including application form/CV, ID Checks, terms of engagement, details of assignments, opt-out notices and interview notes	5 academic years from last engagement on contract	1 yr from last work - Conduct Regs
	Hirer records including client details, terms of business with clients	5 academic years from last engagement on contract	1 yr from last work - Conduct Regs
	Terms of engagement with temporary worker and terms of business with clients	5 academic years from last engagement on contract	6 yr – Limitation Act
	Annual appraisal/assessment records	2 years after employment contract has ended	DP – as long as necessary
	References	5 academic years from last engagement on contract	1 yr from last work - Conduct Regs
	Records held relating to right to work in the UK	5 academic years from last engagement on contract	1 yr from last work - Conduct Regs
	Criminal records checks/ Disclosure and Barring checks	5 academic years from last engagement on contract	1 yr from last work - Conduct Regs

	<p>National Minimum Wage documentation:</p> <ul style="list-style-type: none"> Total pay by the worker and the hours worked by the worker <ul style="list-style-type: none"> Overtime/shift premia Any deduction or payment of accommodation Any absences e.g. rest breaks, sick leave, holiday Any travel or training during working hours and its length Total number of hours in a pay reference period 	3 years after the end of the pay reference period following the one that the records cover	HMRC (National Minimum Wage Act 1998)
--	---	--	---------------------------------------

	Sickness records – statutory sick pay	3 years after the end of the pay reference period following the one that the records cover	HMRC
	Statutory maternity, paternity, adoption pay	3 years from the end of the tax year to which it relates	HMRC
	Pensions auto-enrolment (including auto-enrolment date, joining date, opt in and opt out notices, contributions paid)	6 years except for opt out notices which should be kept for 4 years	HMRC
	Gender pay gap reporting	1 year (but the statement must be kept on the Government website for 3 years)	HMRC
Company Financial Records	VAT	6 years	HMRC
	Company accounts	6 years	HMRC
	<ul style="list-style-type: none"> • Payroll information • CIS records 	3 years from the end of the tax year	HMRC
	ITEPA (the intermediaries legislation) records	No less than 3 years after the end of the tax year to which they relate	HMRC

End of Retention Period

At the end of the retention period, or the life of a record, it should be reviewed and deleted where necessary. The Dunbar Education database flags for review, after a pre-determined period. These flags are sent to Romilly Wakeling, Managing Director of Dunbar Education.

Changes to Policy

Dunbar Education keep this retention policy under regular review and as a result it may be amended from time to time without notice. If you have any questions in relation to this policy please contact Romilly Wakeling, Managing Director of Dunbar Education.