

(NOTE: Throughout this document, THE TEACHER TRAINER LTD is referred to as TTT)

TTT POLICY DOCUMENT

Data Retention and Disposal Policy

How long TTT keeps information and how it is securely disposed of at end of life.

Document Control

Document Title	Data Retention and Disposal Policy
Version	1.0
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Policy Owner	Phenil Mehta, Centre Manager
Data Protection Lead	Phenil Mehta, phenil@theteachertrainer.co.uk
Approved By	Phenil Mehta, Centre Manager
Classification	Public
Applies To	All TTT staff, associates and processors handling TTT records

Data Retention and Disposal Policy

1. Purpose

This policy sets out how long TTT keeps different categories of record and how records are disposed of securely at end of life. It operationalises the storage limitation principle of the UK GDPR and supports TTT's obligations to Ofqual, its Awarding Organisations, HMRC and its learners. The detailed retention schedule in Section 6 is the single reference point for everyone handling TTT records.

2. Scope

This policy applies to:

- All records created or held by TTT in any format, including digital files, emails, paper documents, recordings and backups
- All TTT staff, associates, resellers and processors who handle TTT records
- Records held in third-party systems on behalf of TTT, including the Learning Management System (LMS), email, cloud storage and finance systems

3. Definitions

The following terms carry the meanings given throughout this policy.

Record	Any information, in any format, created or held by TTT in the course of its business.
Retention Period	The minimum and, where applicable, maximum period for which a record is kept.
Trigger Event	The event that starts the retention clock, for example the date of certification, the end of the tax year or the last contact with the data subject.
Disposal	The secure destruction or irreversible anonymisation of a record at the end of its retention period.
Legal Hold	A temporary suspension of disposal where a record is relevant to an actual or reasonably anticipated investigation, regulatory enquiry, appeal or litigation.

4. Policy Statement

TTT is committed to the following principles and commitments.

1. Records are kept for no longer than is necessary for the purposes for which they were collected and for legal, regulatory and operational reasons.
2. Retention periods are documented in the schedule at Section 6 and are reviewed at least annually.

3. Disposal is secure, proportionate to the sensitivity of the record and evidenced where personal or confidential information is involved.
4. A Legal Hold overrides scheduled disposal and is released only when the relevant matter is closed.
5. Where a record is no longer needed but may still have research or operational value, TTT considers anonymisation in preference to retention of identifiable data.
6. Backups are disposed of in line with the same retention principles, through backup rotation and, where needed, specific targeted deletion.

5. Roles and Responsibilities

Role	Responsibility
Centre Manager and Data Protection Lead (Phenil Mehta)	Overall accountability; approves the retention schedule; signs off Legal Holds and releases; authorises any deviation from the schedule.
Course Coordinator	Applies the schedule day-to-day for learner and course records; maintains the Disposal Log.
Course Tutors, Assessors, IQAs and associates	Follow the schedule for records they create; do not retain personal copies of learner data beyond the operational need.
Processors and suppliers	Apply retention and disposal obligations stated in their contract with TTT; on termination, return or securely delete TTT data.

6. Retention Schedule

The following table sets out the standard retention period for each category of record. Where an Awarding Organisation, regulator or legal obligation requires a longer period, the longer period applies. Retention periods run from the stated Trigger Event.

Record	Retention	Trigger	Basis
Learner registration and enrolment records	3 years (min)	Certification or withdrawal	Awarding Organisation, UK GDPR
Assessment evidence (theory and practical)	3 years (min)	Certification	Awarding Organisation, Ofqual
Video assessment recordings	3 years (min)	Certification	Awarding Organisation, UK GDPR
IQA Sampling Reports and Standardisation Minutes	3 years (min)	IQA cycle close	Awarding Organisation, Ofqual
EQA correspondence and reports	3 years (min)	Report issue	Awarding Organisation

Record	Retention	Trigger	Basis
Certification claims and Certificate Log	6 years (min)	Certification	Awarding Organisation
Reasonable Adjustment and Special Consideration records	3 years (min)	Certification or withdrawal	Awarding Organisation, UK GDPR
RPL Claim records	3 years (min)	Certification	Awarding Organisation
Complaints and Appeals case files	3 years (min)	Case closure	UK GDPR, regulatory
Malpractice and Sanctions case files	6 years (min)	Case closure	Awarding Organisation, legal
Safeguarding concerns and referrals	Until age 25 of subject or 6 years, whichever is longer	Last action on case	KCSIE, Working Together, legal
Invoices, receipts, VAT records	6 years	End of accounting year	HMRC
Contracts (including Reseller Agreements)	6 years (min)	Contract end	Limitation Act 1980
Employee records (current staff)	Duration of employment + 6 years	Employment end	Employment, tax, insurance
Recruitment records (unsuccessful applicants)	6 months	Decision	Equality Act limitation
Health and safety incident records (non-RIDDOR)	3 years (min)	Incident date	HASAWA, insurance
RIDDOR-reportable incidents	3 years (min)	Incident date	RIDDOR 2013
Enquiries that did not result in enrolment	Up to 12 months	Last contact	UK GDPR (minimisation)
Marketing consents and opt-outs	Until withdrawn / ongoing	n/a	PECR, UK GDPR
Website analytics (non-cookie logs)	Up to 14 months	Log creation	UK GDPR
Cookie preference data	12 months	Consent capture	PECR

Record	Retention	Trigger	Basis
Email correspondence (general)	3 years (min)	Last in thread	UK GDPR (minimisation)
DPIA and ROPA records	Life of processing + 3 years	End of processing	UK GDPR accountability
Personal data breach records	6 years (min)	Closure	UK GDPR accountability

7. Disposal Methods

Records are disposed of using a method proportionate to their sensitivity.

Record Type	Disposal Method
Digital personal data	Permanent deletion in the source system; emptying of trash folders; documented deletion by the processor.
Digital non-personal data	Standard deletion within the source system.
Paper containing personal or confidential data	Cross-cut shredding; where volume requires, use of a GDPR-compliant confidential waste contractor with a Certificate of Destruction.
Paper non-confidential data	Cross-cut shredding and Recycling.
Removable media (USB drives, DVDs, memory cards)	Secure wipe or physical destruction.
Backups containing personal data	Standard rotation; targeted deletion where a specific data subject right requires it and the backup is accessible.
Video recordings	Secure deletion in the source platform and in any copy location; deletion logged.

8. Disposal Log

Secure disposal of personal data is recorded in the Disposal Log, capturing: the record category, approximate volume, date of disposal, method used, responsible staff member and any Certificate of Destruction reference. The log is retained for six years.

9. Legal Holds

Where a record is relevant to an investigation, regulatory enquiry, appeal or litigation (actual or reasonably anticipated), the Centre Manager issues a written Legal Hold that suspends disposal for the records concerned. The hold is released in writing when the matter is resolved. Legal Holds are logged in the Breach and Incident Register where linked to a breach.

10. Data Subject Erasure Requests

Requests under the right to erasure are handled under the Data Protection and GDPR Policy. Where TTT refuses a request because retention is necessary for legal, regulatory or contractual reasons, the requester is informed of the reason in writing and of their right to complain to the ICO. Where erasure is granted, the record is deleted from active systems, with a reasonable effort made to propagate the deletion to backups.

11. Reviews and Audits

The Centre Manager reviews the retention schedule annually. An audit of a sample of record categories is carried out annually to confirm that records are being retained and disposed of in line with the schedule. Findings are recorded and remediation tracked to closure.

12. Monitoring and Review

This policy is reviewed annually by the Centre Manager as part of TTT's self-evaluation process. Interim reviews are triggered by ICO guidance, Awarding Organisation changes, supplier changes or a material change to TTT's records landscape. All outcomes are recorded in the Version History at Section 14.

13. Related Documents

This policy should be read alongside:

- Data Protection and GDPR Policy
- Privacy Notice
- Information Security and Cyber Security Policy
- Certification Policy
- IQA Policy and EQA Policy
- Complaints Policy and Appeals Policy
- Malpractice and Maladministration Policy
- Safeguarding and Prevent Duty Policy
- Video Assessment Policy

14. Version History

Version	Date	Author	Summary of Changes
1.0	22/04/2026	Phenil Mehta	Consolidates retention periods cited across earlier policies into a single authoritative schedule, adds disposal methods, Disposal Log, Legal Hold process and erasure-request handling.

15. Approval

This policy has been reviewed and approved by the Centre Manager of TTT.

Phenil Mehta
Name

P Mehta
Signature

22/04/2026
Date