

DATA RETENTION POLICY AND SCHEDULE

Statement of Purpose

1. Safe Construction Training Solutions Ltd (the **Organisation, we, our** or **us**) is committed to adhering to the data protection and privacy rights of all individuals whose Personal Data it Processes in the course of its activities. To do so, we are committed to meeting the requirements imposed by UK Data Protection Laws: particularly, requirements under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This Data Retention Policy is implemented to this end, with a focus on the storage limitation principle.
2. This Data Retention Policy is based on the UK Data Protection Laws. If this Policy is at any time inconsistent with this body of law, Safe Construction Training Solutions Ltd will act (including by adjusting any relevant Retention Periods) to meet the requirements imposed by up-to-date UK Data Protection Laws in priority to the requirements set out in this Policy.
3. Any questions in relation to this Policy should be referred to Operations Director in the first instance, via email at jb@sctsuk.co.uk.

Definitions, Interpretation, and Scope

4. Within this Policy, the following terms hold the following meanings:
 - a. **‘Condition for Processing’** means the exceptions to the general prohibition on Processing Special Category Personal Data, specified by UK Data Protection Laws, at least one of which must apply to Processing of Special Category Personal Data for that Processing to be in compliance with UK Data Protection Laws;
 - b. **‘Data Protection Principles’** means the 7 core principles at the heart of the UK Data Protection Laws, which these laws are constructed to uphold;
 - c. **‘Data Subject’** means the individual to whom an item of Personal Data relates and who can be identified from this data;
 - d. **‘Lawful Bases’** means the 6 grounds set out in Article 6 of the UK GDPR, at least one of which must apply to Processing of Personal Data for that Processing to be in compliance with UK Data Protection Laws;
 - e. **‘Personal Data’** means any information relating to an individual who can be identified (either directly or indirectly) by this information. References to Personal Data within this Policy refer to all Personal Data that the Organisation Processes, including any Personal Data that the Organisation stores following use of this data in the course of its work with or via agents, consultants, sub-contractors, or similar;
 - f. **‘Processing’** means any use of Personal Data outside of private personal use, including obtaining, recording, managing, using, storing, or anonymising this data;
 - g. **‘Special Category Personal Data’** means the certain types of personal data that the UK Data Protection Laws identify as being more sensitive in nature than other Personal Data and, consequently, as requiring a higher level of protection; including information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, and biometric data;
 - h. **‘UK Data Protection Laws’** means any law applicable in the UK relating to the Processing of Personal Data, including but not limited to the UK GDPR and the Data Protection Act 2018.
5. The definitions above apply also to the singular or plural, other tense, or other form of such words when used within this Policy.

Legal Justification for Processing

6. Safe Construction Training Solutions Ltd is committed to ensuring that all Processing of Personal Data carried out by us and/or our agents, sub-contractors, consultants, employees, or others working on our behalf is carried out in compliance with UK Data Protection Laws. As such, we confirm that:

- a. All Personal Data is Processed in reliance on one or more of the Lawful Bases;
- b. All Special Category Personal Data is, additionally, Processed in reliance on a separate Condition for Processing; and
- c. All Processing is carried out in accordance with the Data Protection Principles.

7. All necessary documentation and procedures are completed and in place to ensure that all Processing is carried out in accordance with UK Data Protection Laws and the Data Protection Principles (e.g. the transparency and accountability principles).

- a. Key documentation includes our:
 - i. Data Protection and Data Security Policy.
- b. Access to documentation can be requested from Operations Director by emailing jb@sctsuk.co.uk. Access will be granted where it is appropriate to do so (e.g. with regard to other individuals' data privacy and to business confidentiality needs).

Storage Limitation

8. This Data Retention Policy deals primarily with how we will uphold the Data Protection Principle of storage limitation. The storage limitation principle requires that we do not keep (e.g. store) Personal Data for any longer than we need it, with 'need' determined by reference to the purposes and Lawful Bases for which given Personal Data is Processed.

9. Adhering to the storage limitation principle is vital for:

- a. Reducing the risks of data breaches and other security threats to data's privacy and integrity;
- b. Reducing the risk of Personal Data becoming irrelevant, excessive, inaccurate, out-of-date; or being used incorrectly or by accident; and
- c. Reducing the Organisation's legal risk by ensuring that Personal Data is not retained once the applicable Lawful Bases(s) no longer apply (i.e. once it can no longer be Processed in accordance with UK Data Protection Laws).

10. To uphold the storage limitation principle, Safe Construction Training Solutions Ltd's commitments include (but are not limited to):

- a. Adhering to the Retention Periods set out in the schedule to this Policy titled 'Schedule - Retention Periods';
- b. No longer storing Personal Data that, despite not yet having been held for the duration of the applicable Retention Period, is inappropriate to store with regard to UK Data Protection Laws and other laws (e.g. when there is no requirement that it is retained longer for purposes such as maintaining compliant tax and employment records or dealing with legal claims);
- c. Properly handling any individuals' data erasure requests and, where appropriate, complying with such requests; and
- d. Deleting or anonymising Personal Data that is no longer needed in accordance with this Policy.

Retention Periods

11. A **Retention Period** is a set time period after which the applicable type of Personal Data should be considered no longer needed and should be deleted or anonymised, unless a situation applies that

requires certain Personal Data to be stored for longer and which justifies its further Processing (including storing) under UK Data Protection Laws. Justifications and decisions on extended storage periods can be identified and proposed by the Staff Member responsible for the applicable Personal Data, then should be approved by Operations Director before being implemented.

12. Once Personal Data has reached the end of its Retention Period, if no justification for extension or other exception applies, this data should be deleted or anonymised in accordance with the section of this Policy titled 'Dealing with Personal Data that is No Longer Needed'.

13. Safe Construction Training Solutions Ltd's Retention Periods are set out in the schedule to this Policy titled 'Schedule - Retention Periods'.

14. The Retention Periods apply however the Personal Data is held by us (e.g. whatever its location or format).

Dealing with Personal Data that is No Longer Needed

15. All Personal Data that is no longer needed in any way must be either deleted (i.e. erased) or anonymised.

16. Deletion of Personal Data held electronically entails this data being permanently deleted as far as is technologically possible. This means that the Staff Member carrying out the deletion must ensure that, after deletion, it is beyond use (i.e. they must ensure that, if any traces remain, these traces cannot identify the Data Subject). To destroy any electronically held Personal Data, a Staff Member should delete personal data stored electronically, please seek specialist IT advice (here: We Love Technology). The Staff Member carrying out the deletion should ensure that:

- a. Any offline copies of the Personal Data are deleted, as well as published/online versions;
- b. Any backup copies of the Personal Data are deleted, whether or not such copies are up-to-date.

17. Deletion of Personal Data held in hard copy entails destruction of this data to the extent that it is beyond use (e.g. so that it cannot be reassembled or read). To destroy any hard copy Personal Data, a Staff Member should shred the documents containing the data with a shredder, then retrieve all shreds and dispose directly in local recycling centre.

18. Anonymisation entails Personal Data being altered into a form that does not allow identification of the Data Subject in any way (i.e. so that the information no longer constitutes Personal Data and is no longer covered by UK Data Protection Laws). Anonymisation may be carried out as an alternative to deletion when useful for the Organisation and appropriate (e.g. for the purposes of carrying out statistical analysis with a large, anonymous dataset).

19. If a Staff Member needs to delete or anonymise Personal Data and they are uncertain as to how to appropriately do so, they should contact Operations Director via email at jb@sctsuk.co.uk for assistance.

Responsibility

20. Day-to-day responsibility for monitoring compliance with this Policy, for setting, evaluating, and adapting data retention practices and this Policy, and for setting, evaluating, and adapting Retention Periods, sits with Operations Director.

21. All individuals working for or acting on behalf of Safe Construction Training Solutions Ltd at all levels, including senior managers, officers, employees, consultants, trainees, homeworkers, part-time and fixed-term workers, casual workers, agency workers, volunteers, and interns (collectively '**Staff Members**') should follow this Policy in relation to any Personal Data that they Process. If they have any questions or concerns related to this Policy and their data storage obligations, they should contact Operations Director via email at jb@sctsuk.co.uk.

Changes to the Policy and to Retention Periods

22. This Policy does not form part of any contract of employment or similar and Safe Construction Training Solutions Ltd may amend it at any time at our absolute discretion.

23. Any changes to the Retention Periods will be made in compliance with the law and a new justification will be provided for each new Retention Period set. Any such changes will be communicated to relevant Staff Members in a timely manner to ensure that practices are adapted accordingly.

24. Retention Periods will be reviewed by Operations Director (or somebody who Operations Director has assigned to review the Retention Periods on their behalf and subject to their approval) at least once every year, to ensure that these Retention Periods are still reasonable with regard to any changes to the Personal Data held and to any new laws or guidance relevant to a given Retention Period.

Schedule - Retention Periods

<i>Type of Personal Data</i>	<i>Description/ Examples</i>	<i>Purpose of Processing</i>	<i>Retention Period</i>	<i>Justification</i>	<i>Responsibility for this Type of Personal Data</i>
Sensitive Personal Data	a) race b) ethnic origin c) politics d) religion e) trade union membership f) genetics g) biometrics (where used for ID purposes) h) health i) sex life or j) sexual orientation.	To allow delivering the service in accordance with Equal Opportunities Policy	3 years after completion of the course	for the purposes of allowing the organisation to respond to potential future legal claims (eg data may be retained until a relevant limitation period has been exceeded) and for historical, research, and statistical purposes (this is essentially the only justification that may allow personal data to be	Operations Director

				retained indefinitely)	
Employees' personal information files and Bank Details	<ul style="list-style-type: none"> • Personal Information: Name, address, date of birth, sex, emergency contact details, personal contact number. • Employment Details: Job title, salary, benefits, start date, and any changes to their terms of employment. • Performance and Development: Performance reviews, appraisals, feedback, training records, and any disciplinary actions. • Attendance and Leave: Records of absences, holidays, and any other leave taken. • Financial Information: Payroll and tax information, such as payslips and tax codes, bank name, account number and sort code. • Other Relevant Documents: Job application, CV, cover letter, employment contract, resignation letter, exit interview documentation, and any other documents related to their employment. 	Employee personal information files are stored to comply with legal requirements, support personnel administration, and to be prepared for potential employee relations issues. These files also serve as a historical record of the employee's time with the company. They can be used in legal proceedings, for employee appraisals, and for managing various aspects of the employee's role. It is also to provide wage payments in order to carry out the employer's obligations under contracts of employment.	7 years after Employee Contract has been terminated or Employee no longer works for the Business.	In accordance with Taxes Management Act 1970	Operations Director
Learners, Tutors and Assessors Information	a) Learner name. b) learner number or ULN. c) Learner contact address and telephone number. d) Regulator reference and title of	To ensure that any claims for certification can be substantiated, to support any	7 years after from the date of certification	To ensure that any claims for certification can be substantiated, to support any	Operations Director

	<p>the qualification the learner was registered on. e) Date of the qualification achievement. f) Grade of the qualification (if applicable)</p> <p>Details of unit achievement including: a) The name and regulator reference number of the unit achieved. b) The name of the Tutor/Trainer and Assessor for the unit. c) The name of the IQA (if sampled). d) The date the unit was judged as achieved within the Centre. e) Grade of the unit (if applicable)</p>	malpractice claims and to respond to information requests from regulatory bodies.		malpractice claims and to respond to information requests from regulatory bodies.	
Other Training Centre Data	<p>Records of the assessment plan and assessment decisions for each learner, including the details of who assessed, what was assessed (learning outcome reference and assessment criteria), where it was assessed and the date the assessment decision was made. b) Details of all examinations conducted and their results. c) Synoptic Practical Assignments completed including any evidence generated. d) Records of progress/assessment criteria measured in guided learning hours (GLH)</p>	To reassure valid and accurate code of conduct of the Training Centre.	3 years after Certificate has been issued and Course has been completed.	To ensure that any claims for certification can be substantiated, to support any malpractice claims and to respond to information requests regulatory bodies.	Operations Director

	<p>and total qualification time (TQT).</p> <p>e) A record of any exemption/Recognition of Prior Learning (RPL) used.</p> <p>f) The assessment methods used for each unit/component.</p> <p>g) Locations of where supporting evidence was gathered and stored at the time of assessment.</p> <p>h) Assessment reviews.</p> <p>Records of internal quality assurance activity including:</p> <p>a) Details of the sample selected and internal quality assurance strategy.</p> <p>b) Internal quality assurance details including the assessment decisions verified, the name of the IQA and the date the verification took place.</p> <p>c) Records of internal quality assurance standardisation meetings.</p> <p>d) Records of Assessor support meetings and/or query resolution records.</p> <p>e) All completed declaration of authenticities.</p>				
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Andrew Sutton

Andrew Sutton
Director
Dated: May 2025