

Record Retention Policy

Operam Education Group (OEG) and of its subsidiary businesses; Provide Education, Teachers UK, The Education Specialists, Key Stage Teacher Supply, First for Education, Bridge Education, and Horizon Teachers, are committed to retaining, storing and disposing of records in accordance with applicable legislation and recognised best practice.

This policy supports compliance with:

- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Conduct of Employment Agencies and Employment Businesses Regulations 2003
- Keeping Children Safe in Education (KCSIE)
- Relevant guidance issued by the Information Commissioner's Office (ICO)
- Other applicable employment, tax and safeguarding legislation

Record Management

Personal and sensitive information, including CVs, application forms, Equal Opportunities monitoring information, right to work documentation, identification documents and records held within our CRM system, is processed securely and only retained for as long as necessary.

Original documents are not normally retained unless required by law. Electronic copies are stored securely and, where appropriate, in a non-editable format. Copies are verified to confirm that the original document has been seen and, where applicable, that any photograph is a true likeness of the individual. Access to records is restricted to authorised personnel with a legitimate business need.

Safeguarding Records

In accordance with *Keeping Children Safe in Education (KCSIE)*, records relating to safeguarding concerns, allegations, referrals or investigations may be retained beyond the standard retention period where necessary to:

- protect children and young people;
- comply with statutory safeguarding guidance;
- support ongoing investigations;
- meet regulatory requirements; or
- establish, exercise or defend legal claims.

Where appropriate, advice will be sought before any safeguarding records are destroyed.

Right to Erasure

Where an individual exercises their right to erasure, OEG will assess the request in accordance with UK GDPR.

Records will only be deleted where there is no overriding legal obligation, safeguarding requirement, regulatory requirement or legitimate business interest requiring continued retention

Secure Disposal

Records that have reached the end of their retention period and are no longer required will be securely deleted or, where appropriate, anonymised using approved deletion processes within our CRM and other business systems. Paper records, where retained, will be securely shredded or disposed of through an approved confidential waste service.

Legal

Where records are required for litigation, employment tribunal proceedings, safeguarding investigations, police enquiries, regulatory investigations, insurance claims or other legal proceedings, the normal retention period will be suspended until the matter has concluded.

Policy Review

This policy will be reviewed annually, or sooner where legislation, regulatory guidance or business requirements change, including updates issued by the Information Commissioner's Office (ICO) or the Department for Education (DfE).

Document Retention Schedule

Document Type	Retention Length	Legal / Regulatory Basis
Candidate records (application form/CV, ID checks, terms of engagement, assignment details, opt notices, interview notes for unsuccessful candidates)	3 years from the last date of assignment or introduction	Conduct of Employment Agencies and Employment Businesses Regulations 2003
Hirer records (client details, terms of business, assignment/vacancy details)	3 years from the last date of supply or introduction	Conduct of Employment Agencies and Employment Businesses Regulations 2003
Terms of Engagement with temporary workers / Terms of Business with clients	7 years	Limitation Act 1980
Staff records (CV, ID, bank details, references, personnel files including absence & disciplinary records)	7 years after employment ends	Limitation Act 1980
Working time records (48-hour opt-out, annual leave)	3 years from creation	Working Time Regulations 1998
Annual appraisal and performance reviews	7 years from leaving date	Best practice / Limitation Act 1980
Employment/Character References	3 years after introduction to a client or end of engagement ends (whichever is later)	Best practice

DBS Enhanced Disclosure	DBS certificate information not retained for longer than 6 months. A record of the DBS check (certificate number, date, level of check, workforce, recruitment decision and renewal date where applicable) is retained for safeguarding and audit purposes.	DBS Code of Practice / KCSIE
Safeguarding concerns, allegations and investigations	Retained in accordance with KCSIE and organisational safeguarding requirements. Longer retention may apply depending on the circumstances.	KCSIE
National Minimum Wage documentation (total pay, hours worked, overtime, deductions, accommodation, absences, travel/training hours)	7 years after the end of the relevant pay reference period	National Minimum Wage Act 1998
Sickness records – statutory sick pay (SSP)	7 years from leaving date	HMRC requirements
Statutory maternity, paternity, adoption pay and shared parental pay records	7 years from the end of the relevant tax year	HMRC requirements
Pension auto-enrolment (including opt-out notices)	6 years (opt-out notices: 4 years)	Pensions Act 2008
Customer and marketing information (contact details, purchase details)	Duration of the relationship and up to 7 years after end of relationship.	UK GDPR/Limitation Act 1980
Financial records, invoices and accounting documentation	6 years from the end of the relevant financial year	Companies Act 2006 / HMRC requirements

Responsibilities

The Data Protection Lead is responsible for monitoring compliance with this policy.

Managers are responsible for ensuring records within their area are retained, reviewed and securely disposed of in accordance with this policy.

All employees are responsible for handling records in accordance with this policy and reporting any concerns regarding record retention or disposal.