



Data Retention Policy (GDPR)

1. Purpose

This policy sets out how Hughes Driver Training Ltd (“HDT”) retains and securely disposes of personal data in line with the **UK GDPR** and the Data Protection Act 2018.

We are committed to ensuring that personal data is:

- Not kept for longer than necessary
- Retained in line with legal, regulatory, and operational requirements
- Securely deleted or anonymised when no longer required

2. Scope

This policy applies to:

- All employees, instructors, contractors, and applicants
- All personal data processed by HDT, including:
 - HR and recruitment data
 - Learner data (including Skills Bootcamps)
 - Compliance data (e.g. DBS, BPSS, MoD onboarding)
 - Data collected via systems such as Google Forms, Salesforce, and internal trackers

3. Principles of Data Retention

HDT follows these principles:

- Data will only be kept for a **defined, justifiable period**
- Retention periods are based on:

- Legal obligations
- Funding requirements (e.g. DfE/Bootcamps)
- Business needs
- Data will be **reviewed regularly**
- Data no longer required will be:
 - Securely deleted, or
 - Anonymised where appropriate

4. Retention Periods

4.1 Recruitment Data (Unsuccessful Candidates)

- CVs, interview notes, application forms
- **Retention:** 6 months from decision
- **Reason:** Defend potential employment claims

4.2 Employee Records

- Contracts, payroll, performance, disciplinary records
- **Retention:** 6 years after employment ends
- **Reason:** Legal claims and HMRC requirements

4.3 Right to Work Documents

- Passport copies, visa checks
- **Retention:** Duration of employment + 2 years
- **Reason:** Home Office compliance

4.4 DBS Checks

- DBS certificate number, date, outcome (not full certificate unless necessary)
- **Retention:** 6 months for certificate copies (if held)
- Basic record (status/date): duration of employment

4.5 MoD / BPSS Clearance Records

- Identity checks, references, screening documentation
- **Retention:** Duration of engagement + up to 7 years (depending on contract requirements)
- **Reason:** Contractual and security compliance

4.6 Learner Records (Bootcamps / Funded Training)

- Enrolment forms, ID, assessment records, outcomes
- **Retention:** Typically 6 years (or as required by DfE/ESFA funding rules)
- **Reason:** Audit and funding evidence

4.7 Safeguarding Records

- Incident reports, concerns, referrals
- **Retention:** Up to 6 years (or longer if serious safeguarding concern)
- **Reason:** Legal safeguarding obligations

4.8 Google Forms / CRM Data

- Contact forms, onboarding forms, interest forms
- **Retention:**
 - General enquiries: 12 months
 - Recruitment/onboarding: aligned to recruitment or employee records

4.9 Payroll and Financial Records

- Salary, tax, NI, pension
- **Retention:** 6 years
- **Reason:** HMRC compliance

5. Data Storage & Security

HDT stores data securely using:

- Google Workspace (restricted access)

- Secure CRM systems (e.g. Salesforce)
- Controlled access folders and staff permissions

We ensure:

- Access is limited to authorised personnel only
- Sensitive data (e.g. DBS, ID) is handled with additional care
- Data is protected against unauthorised access, loss, or misuse

6. Data Disposal

When retention periods expire:

- Digital data is permanently deleted
- Paper records are securely shredded
- Systems and shared drives are reviewed regularly

Managers are responsible for ensuring:

- Old data is not retained unnecessarily
- Shared folders and Google Forms responses are reviewed and cleared

7. Responsibilities

- **Head of People / DSL (HDT):** Overall responsibility for compliance
- **Managers:** Ensure correct handling and deletion of data
- **All staff:** Must follow this policy and report concerns

8. Review of Policy

This policy will be reviewed annually or in line with changes to:

- Legislation
- Ofsted or DfE requirements
- Business operations

9. Key Reminder

If you don't have a clear reason to keep personal data you shouldn't be keeping it.

10. Contact Us

If you have any questions about this policy or how your data is handled, please contact:

Hughes Driver Training Ltd

Email: Rosie@hughesdrivertraining.co.uk