Document & Data Retention Policy 2026 – 2027

Date of Review:	10/05/2026
Date of next Review:	10/05/2027
Approved by:	Anthony Lovell
Position:	Head of Quality and Performance
Signature:	

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Document and Data Retention Policy

1. Purpose

The purpose of this policy is to set out how Vision Rehabilitation Training Ltd ("VRT") collects, processes, stores, retains, and securely disposes of personal data relating to apprentices, employers, staff, and other stakeholders.

This policy ensures compliance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Education and Skills Funding Agency (ESFA) funding rules
- Ofsted inspection requirements
- Other applicable legal, regulatory, and contractual obligations.

VRT is committed to processing personal data fairly, lawfully, transparently, and securely.

2. Scope

This policy applies to:

- All personal data collected and processed by VRT in the course of delivering apprenticeship and training programmes.
- All staff, contractors, apprentices, and partner organisations involved in data handling.
- All systems, platforms, and paper records used to store personal data.

3. Definitions

- **Personal Data**: Any information relating to an identified or identifiable living individual.
- **Special Category Data**: Sensitive data requiring additional protection under Article 9 of UK GDPR (e.g. health information).
- **Processing**: Any operation performed on personal data, including collection, storage, sharing, and disposal.
- **Data Subject**: The individual whose personal data is being processed.

4. Categories of Personal Data Processed

4.1 Personal Data (Standard Category)

- Name, address, date of birth, gender
- Contact information (email, phone, address)
- National Insurance number and Unique Learner Number (ULN)
- Employment details (employer name, job title, work location)
- Education and training history
- Assessment results, attendance, progress records
- Funding and financial records
- Communications and system access logs

4.2 Special Category Data (Sensitive)

- Health or disability information (e.g. vision impairment, medical conditions)
- Equality and diversity data (ethnicity, religion, sexual orientation)
- DBS (Disclosure and Barring Service) checks where required
- Safeguarding and welfare records

5. Lawful Bases for Processing

VRT processes personal data under the following lawful bases in accordance with Article 6 and Article 9 of UK GDPR:

Lawful Basis	Purpose
Contractual obligation	To deliver apprenticeship training and support
Legal obligation	To meet ESFA funding and statutory reporting requirements
Public task	To support education and skills development under national frameworks
Legitimate interests	To manage programmes, monitor quality and ensure learner progress
Consent (for specific cases only)	For some special category data and equality monitoring where required
Vital interests	To protect health, safety, and welfare of learners and staff in emergencies

6. Data Retention Periods

VRT retains personal data only for as long as necessary to meet legal, contractual, or operational requirements.

Data Category	Retention Period	Notes
Personal learner records	6 years after apprenticeship completion or withdrawal	To meet ESFA audit and funding requirements
Special category data	Only as long as necessary	Deleted or anonymised once no longer required
Funding and financial records	6 years after the funding year end	Required for audit and financial reporting
Safeguarding and welfare records	Until the learner reaches 25 years old OR 6 years post case closure	In line with statutory safeguarding guidance
DBS checks	Maximum 6 months after recruitment decision	Securely destroyed after use
Ofsted/QA inspection records	Up to 6 years	To evidence compliance for inspections

7. Data Storage and Security

- Personal data is stored securely in password-protected systems, encrypted cloud platforms, and locked cabinets.
- Access is restricted to authorised personnel only.
- Data is transmitted using secure methods (e.g. encrypted email, secure file transfer).
- Regular backups are maintained, and security measures are reviewed annually.

8. Data Sharing

Personal data may be shared with:

- The ESFA (for funding and compliance)
- Employers and workplace supervisors (for training and support purposes)
- End-point assessment organisations and awarding bodies
- Ofsted and other regulators
- Safeguarding and statutory agencies where legally required

Only the minimum information necessary is shared, and all sharing is logged and governed by data sharing agreements where applicable.

9. Data Disposal

- Data no longer required will be securely destroyed or anonymised.
- Paper records will be shredded or securely disposed of by an approved contractor.
- Digital records will be permanently deleted from all systems and backups in line with the retention schedule.

10. Data Subject Rights

Under UK GDPR, individuals have the right to:

- Access their personal data (Subject Access Request)
- Rectify inaccurate or incomplete data
- Request erasure where appropriate
- Restrict or object to processing in certain circumstances
- Data portability (where applicable)
- Complain to Information Commissioner's Office (ICO)

Requests will be responded to within one calendar month.

11. Roles and Responsibilities

- **Data Protection Lead (DPL)**: Responsible for ensuring compliance, maintaining records, and responding to data subject requests.
- **All staff and contractors**: Must comply with this policy, follow data protection procedures, and report any breaches immediately.
- **Apprentices and employers**: Must provide accurate information and update VRT of any changes.

12. Data Breach Reporting

Any actual or suspected data breach must be reported immediately to the Data Protection Lead. Serious breaches will be reported to the ICO within 72 hours, in accordance with UK GDPR.