

1. Scope and Application

- 1.1. This policy applies to The City and Guilds of London Institute, its subsidiaries, business units and brands (together the “**City & Guilds Group**”).
- 1.2. This policy describes the City & Guilds Group’s approach to the retention of the personal data of individuals whose personal data are processed by a member of the City & Guilds Group, in accordance with applicable data protection laws, including Regulation (EU) 2016/679 (**GDPR**).
- 1.3. This policy applies to all business activities that may involve the processing of personal data undertaken by a member of the City & Guilds Group or by any person working under the direction or control of a member of the City & Guilds Group. This includes members of the Management Board, Trustee Board, officers, employees, and any third party entity or person granted access to personal data in the custody or control of a member of the City & Guilds Group (**personnel**).
- 1.4. This policy is in internal policy, and is available on the City & Guilds Group intranet, and to personnel. This policy may be made available, in PDF format, to external third parties on request.

2. Roles and Responsibilities

- 2.1. The Management Board has overall responsibility for ensuring adherence to this policy by all members of the City & Guilds Group.
- 2.2. Data Owners (as defined on the Group Data Protection SharePoint Site) are responsible for the operational implementation of this Policy within their responsible business area.
- 2.3. The City & Guilds Group Data Protection Team is responsible for:
 - responding to queries about this policy - which may be sent to gdpr@cityandguilds.com;
 - collecting feedback from Data Owners about this policy;
 - reviewing this policy, as necessary, to ensure that it meets the requirements of applicable data protection laws.

3. Storage Limitation Principle

- 3.1. In the course of carrying out its various business activities, members of the City & Guilds Group collect information from individuals and external organisations and generate a wide range of data and information which is recorded and stored.
- 3.2. This policy covers all data, files, records, agreements, contracts, correspondence, images, which may contain personal data. It also covers information which may be retrieved in readable form, for example, from microfilm, tape recordings and videos. The term “**document**” in this policy refers to all such information.
- 3.3. The storage limitation principle in the GDPR requires that personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- 3.4. Personal data may be stored for longer periods where the personal data will be processed solely for: archiving purposes in the public interest; scientific or historical research purposes; or statistical purposes, subject to implementation of appropriate

technical and organisational

measures required by the GDPR in order to safeguard the rights and freedoms of the data subject.

- 3.5. This policy sets out the storage periods applicable to key categories of documents containing personal data, taking into account the operational needs of the City & Guilds Group whilst recognising the need to destroy personal data that is no longer necessary for the purposes for which the personal data was originally processed.
- 3.6. A “**document owner**” is the person with primary responsibility for the document. In many cases, this will be the person that created the document, or the person responsible for keeping the document up to date.
- 3.7. It is the document owner’s responsibility to:
- set dates for the review and destruction of the documents in accordance with the document retention periods set out in Appendix A;
 - review the documents at the end of the retention period, and determine whether they should be destroyed or retained for a longer period;
 - dispose of any documents that are no longer required in an appropriate manner. Physical documents may be shredded or disposed of in confidential paper bins. When deleting electronic files, check that all duplications are deleted;
 - ensure a record is kept of the documents destroyed, or the reasoning for any prolonged retention.

4. Document and Data Retention Periods

- 4.1. In accordance with the storage limitation principle, personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- 4.2. Appendix A sets out the key categories of documents which members of the City & Guilds Group may deal with on a day to day basis, together with the required or recommended retention period for such documents.
- 4.3. Documents that are relevant or potentially relevant to any criminal or civil litigation or regulatory investigation which is currently in process or in contemplation or reasonably in prospect must never be destroyed, altered or sent out of our control or power. These documents may be required in defending the interests of a member of the City & Guilds Group, an officers or employee or may be required to be produced to an authority or another party. The destruction of documents to pervert the course of justice or to hinder any regulatory investigation is expressly prohibited under this policy. Failure to comply with this prohibition may expose an individual to civil sanctions or criminal prosecution, including fines and imprisonment.

5. Compliance with this Policy

- 5.1. Failure to adhere to the storage periods in this policy may result in breach of applicable data protection laws, as well as difficulty defending or pursuing claims, operational issues, or reputational damage.
- 5.2. This policy does not form part of any employment contract, and may be amended at any time. However, any personnel who breach this policy may face disciplinary action, in accordance with applicable HR policies and procedures.

1. CENTRE DOCUMENTATION

Business Area	Document	Retention Period	Reasons/Comments	Document Owner
UK Commercial /ILM /International	Centre documentation, including external verifier reports (and other quality assurance documentation), central approval records, operating procedures and related correspondence	6 years after the centre contract has ended	Business needs	Director of UK Commercial
UK Commercial /ILM /International	Operating procedures for local offices/territories including verifiers' updates	6 years	Business needs	Director of UK Commercial
Review and Regulation /ILM /International	Investigation records and appeal documents	7 years or if the case in question relates to a police case, then indefinitely	Business needs	Head of Regulation and Audit
Operations /ILM /International	Assessor, verifier and auditor details	6 years	GDPR Business needs	Director of Operations

2. QUALIFICATION, PRODUCT AND STRATEGY RECORDS

Business Area	Document	Retention Period	Reasons/Comments	Document Owner
Product /ILM /International	Product documentation including handbooks, assessment criteria and learning outcomes for qualifications	6 years after certification	Business needs	Lead Portfolio Manager
Product /ILM /International	Assessment Strategies for N/SVQs	2 years from version date	Business needs	Lead Portfolio Manager

3. CANDIDATE AND CLIENT RECORDS AND CERTIFICATES

Business Area	Document	Retention Period	Reasons/Comments	Document Owner
Operations /ILM /International	Candidate data (including results and Candidate Assessment Report Forms)	Indefinitely	GDPR Business needs Evidence of compliance	Director of Operations
UK Commercial /ILM /International	Candidate correspondence (including complaints and appeal documents)	7 years	Business needs	Director of UK Commercial /Head of Regulation and Audit
UK Commercial (Learning Assistant)	Candidate portfolio of evidence	3 years post completion of a portfolio	Business needs Evidence of compliance	Director of UK Product Operations and Projects
Operations /ILM /International	Certificate templates (including old versions)	Indefinitely	Business needs Evidence of compliance	Director of Operations
Operations	Physical copies of examiner marked scripts (with invigilator certificates) and multiple choice answer sheets	12 months	Business needs	Director of Operations
Operations	Digital images of examiner marked scripts (with invigilation certificates), multiple choice answer sheets with image annotation	12 months	Business needs	Director of Operations
The Oxford Group	Participant / coachee records, including evaluation results forms	24 months after the client contract has ended	Business needs	Executive Coaching Hub & Project Manager

4. CONTRACTS AND OTHER LEGAL RECORDS (INCLUDING INSURANCE POLICIES)

Business Area	Document	Retention Period	Reasons/Comments	Document Owner
All	Contracts (including variation letters, intellectual property agreements, licences and standard terms and conditions)	6 years after termination or expiry	Limitation period	Director of Legal (if sent to Legal), or Contract Manager (if not)
Facilities	Contracts relating to building repairs and maintenance	15 years after performance	Possibility of latent damage	Head of Facilities
Legal	Deeds	12 years after performance	Limitation period	Director of Legal (if sent to Legal), or Contract Manager (if not)
Legal	Standard contract templates	6 years from end of use	Business needs	Director of Legal
Legal	Advice (including file notes) from in-house or external lawyers to business	6 years from end of use	Business needs Limitation period	Director of Legal
Legal	Intellectual property enforcement documentation	6 years from end of use	Business needs. Limitation period	Director of Legal
Legal	Trade/service marks and designs: certificates of registration	6 years after cessation of registration	Proof of ownership of trade mark registration	Director of Legal
All	Trade/service marks and designs: evidence of use	Indefinitely	To prove use (e.g. where validity of registrations is challenged or unregistered rights must be proved)	Head of Function

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All	Copyright: Literary, dramatic, artistic and musical works and films in which we own copyright	70 years from end of calendar year in which the relevant person dies	Evidence. Copyright, Designs and Patents Act 1988	Head of Function
All	Copyright: recordings, photos and broadcasts in which we own copyright	50 years	Evidence Copyright, Designs and Patents Act 1988	Head of Function
Legal	Patents: licences, applications, assignment of patent rights and related records	For the life of patent plus 6 years	Evidence Limitation period Patents Act 1977, ss. 30 and 68	Director of Legal
Legal	Patents: applications for extension of patents	For the life of patent (if granted)	Evidence – the information will be useful for prosecuting infringements and defending patents in other ways	Director of Legal
Facilities	Insurance records including policies, proposal forms, certificates and renewal notices	As long as claims may be made under the policy	Policy certificates may be retained longer to show evidence of compliance	Head of Facilities
Gen2	Sellafield commercial information	100 years	Contractual requirement	Gen2 Director
Gen2	ESF contract and supporting documentation	31 December 2030	Contractual requirement	Gen2 Director

Note, if a contract stipulates a retention period, the contracting member of the City & Guilds Group must retain the relevant documentation for the stated period.

5. INFORMATION MANAGEMENT

Business Area	Document	Retention Period	Reasons/Comments	Document Owner
All	Departmental policies, procedural manuals, information management policies, templates and departmental meeting minutes	Life of business plus 6 years after striking off	Business needs Evidence of compliance	Head of Function
All	General administrative records and correspondence (but see emails below)	6 years	Limitation period	Head of Function
IT	Emails (archive)	6 years	Limitation period	Infrastructure Manager
IT	Internal project documentation	6 years from end of project	Limitation period. Evidence	Head of Function
Legal	Requests for information from data subjects and consents for the processing of personal and sensitive data	7 years from date of request and/or consent	GDPR Business needs Evidence of compliance	Director of Legal
All	Lists/catalogues of records transferred to storage	5 years	Business needs	Head of Function
Facilities	Records relating to storage including on and off site and transfer	2 years	Business needs	Head of Facilities
All	Lists, certificates or databases of records destroyed	Indefinitely	Business needs	Head of Function
All	Register of records held which belong to other organisations or records loan to other organisations	Until records returned to other organisations or destroyed	Business needs	Head of Function
Legal	Contracts register	21 years	Business needs Limitation period	Director of Legal

6. EMPLOYMENT AND RECRUITMENT RECORDS

Business Area	Document	Retention Period	Reasons/Comments	Document Owner
HR	Employee e-file, including: CV, recruitment documentation, employment contract, variation letters, details of any flexible working request, maternity or family friendly requests, absence management + fit notes and correspondence about promotion / development All employee case work information held separately in a secure Employee Case work e-folder	6 years after employee leaves	Limitation period	Head of Function
HR	Employee Agresso/Pse records including all data held electronically on an employee, including pay history, job history, contact details, EDI data, address and bank details	6 years after employee leaves	Limitation period	Head of Function
HR	Employee paper records including all data held in paper based personnel files. Paper files will be securely stored at our outsource storage facility managed by Iron Mountain	6 years after employee leaves	Limitation period	Head of Function
HR	Pay, organisational design, talent management , pay and bonus modelling, SIPs, change programme details, talent and succession planning projects, redundancy modelling and OD plans	6 financial years	Tax purposes Limitation period	Head of Function

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HR	Learning and development records on Aspire and other LMS' including courses taken, mandatory training, pass rates, employee email details	6 years after employee leaves	Business needs Limitation period	Head of Learning and Development
HR	Employee correspondence on Outlook / local employee files including emails in Outlook relating to an individual employee, or a specific ER case, locally held electronic or paper files including performance management / Honest Conversations paperwork, return to work forms	1 year after employee leaves	Best practice	Head of Function
HR	Candidate information – recruitment including all data held on our candidate Application Tracking System (ATS) (currently HireServe) and by hiring managers electronically or paper based (e.g. print out of CVs)	6 months after end of recruitment process	Evidence to protect against actions for discrimination, etc.	Head of Function
HR	Candidate information – data held on our candidate Application Tracking System (ATS) (currently HireServe) for future employment opportunities which may arise	2 years following recruitment process	Specific candidate consent given to hold personal data for future recruitment opportunities	Head of Function
HR	Disputes and tribunal documentation (including pleadings, witness statements and claims correspondence)	6 years after employee leaves	Limitation period	Head of Function

Payroll	Statutory sick pay records including dates of sickness absence of at least four consecutive days and all payments of SSP made	6 rolling tax years after the year in which the payment was made	Limitation period	Head of Function
Payroll	Statutory maternity pay records and certificates required to be kept by employer under the Statutory Maternity Pay (General) Regulations 1986, reg. 26	6 rolling tax years after the year in which the payment was made	Limitation period	Head of Function
Payroll	Statutory paternity pay records	6 rolling tax years after the year in which the payment was made	Limitation period	Head of Function

7. HEALTH AND SAFETY RECORDS

Business Area	Document	Retention Period	Reasons/Comments	Document Owner
HR	Health and safety training records	6 years from leaving employment	Evidence of compliance. Limitation period	Group Wellbeing and Safety Manager
HR	Accident book and record of any reportable injury, disease and dangerous occurrence (RIDDOR)	6 years from incident occurring	Approved Code of Practice, Evidence of compliance and liability defence. Limitation period	Group Wellbeing and Safety Manager
HR	Risk assessments	6 years after being superseded by newer assessment	Statutory, evidence of compliance and liability defence. Limitation period	Group Wellbeing and Safety Manager
HR	Health and safety policies	6 years after being superseded by newer policies	Statutory, evidence of compliance and liability defence. Limitation period	Group Wellbeing and Safety Manager

8. ACCOUNTING, TAX AND OTHER FINANCIAL RECORDS

Business Area	Document	Retention Period	Reasons/Comments	Document Owner
Finance	Accounting records (including payments, cash book or record of payments made, invoices, petty cash records, instructions to banks, claim forms and expenses records)	6 years from year end	Tax purposes	Financial Controller
Finance	Tax records (including payments, cash book or record of payments made, invoices, petty cash records, instructions to banks and expenses records)	7 years from year end	Tax purposes	Financial Controller
Finance	Documentation relating to donations and grants including correspondence regarding granted donations, donation and subscription records and index of donations granted	6 years from end of tax year in which last payment under the declaration was made	Business needs. Declarations continue in force until revoked or cancelled	Financial Controller
Finance	PAYE records documentation	3 years after the end of the tax year to which they relate	Income Tax (PAYE) Regulations 2003, re. 97	Financial Controller
Finance	Signed annual reports and accounts	Life of the company plus 6 years after striking off	Evidence. Business needs	Financial Controller
Finance	Budgets and periodic internal financial reports	6 years	Evidence. Best practice and Internal Control	Financial Controller
Finance	Successful quotes in relation to purchases	6 years after termination or expiry of contract	Business needs	Financial Controller
Finance	Unsuccessful quotes in relation to purchases	2 years	Business needs and audit purposes	Financial Controller

9. PENSION RECORDS

This section only relates to the documents owned by The City and Guilds of London Institute; all documents relating to the Pension Scheme are held in accordance with the Pension Trustees' Document Retention Policy.

Business Area	Document	Retention Period	Reasons/Comments	Document Owner
Pensions	Membership records (including active and deferred, pensioners, dependants and deceased)	10 years after benefit ceases	Commercial	Pensions Manager
Pensions	Pension trust deeds and rules	Life of the scheme	Companies Act, Commercial, Pensions Act 2004 Keep original documents	Pensions Manager
Pensions	Trustees' minute book	Life of the scheme	Best practice, must be kept in writing	Pensions Manager
Pensions	Records of all payments into and out of the scheme	6 years from the end of the scheme year to which they relate	Occupational Pension Schemes (Administration and Audited Accounts) (Amendment) Regulations 2005 regulations 12-14	Pensions Manager
Pensions	Insurance policy records	6 years from the end of the scheme year to which they relate	Occupational Pension Schemes (Administration and Audited Accounts) (Amendment) Regulations 2005 regulations 12-14	Pensions Manager
Pensions	Trust Investment policies	12 years from the end of the scheme year to which they relate	Occupational Pension Schemes (Administration and Audited Accounts) (Amendment) Regulations 2005 regulations 12-14	Pensions Manager

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Pensions	Accounts and Actuarial Valuation Reports	6 years from the end of the scheme year in which falls the date the accounts were signed or, as the case may be, the report was signed	Retirement Benefits Schemes (Information Powers) (Amendment) Regulations 2002 regulation 15(5)	Pensions Manager
Pensions	Statement of Investment Principles (SIP) and Policies required by Section 35 of Pensions Act 1995 as amended by Pensions Act 2004	12 years after revision		Pensions Manager
Pensions	IDRP (Internal Disputes Resolution Procedure)	Until revised or replaced	Required to show compliance with Pensions Act	Pensions Manager
Pensions	Revenue Approvals	Life of Scheme		Pensions Manager
Pensions	Written appointment terms of professional advisors' contracts	6 years after appointment ceases	Required to show compliance with Pensions Act	Pensions Manager

10. MARKETING RECORDS

Business Area	Document	Retention Period	Reasons/Comments	Document Owner
Strategy	Market research reports	3 years	Business needs	Director of Strategy
Marketing	Marketing mailing lists (including unsubscribe lists)	As long as list remains active	Business needs	Group Head of Marketing
Marketing	Marketing materials including press releases and coverage and advertisements	3 years after use	Evidence of compliance	Group Head of Marketing

11. CORPORATE RECORDS

In this section:

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- CGLI means The City and Guilds of London Institute; and
- “Corporate records” include company registration documents, constitutional documents, registers, and documents relating to meetings of trustees, directors, committees and members (e.g. agendas, papers and minutes).

Business Area	Document	Retention Period	Reasons/Comments	Document Owner
Legal	Such corporate records as are kept by CGLI	Life of CGLI plus 6 years after striking off	Best practice	CGLI Secretary
Legal	Corporate records of UK companies which are required by UK law or by local law in countries where the UK company is registered	Life of the company plus at least 6 years after striking off	Statutory requirement. Additional 6 years because company can be restored to register up to 6 years after striking off. Prospective liability after that period to be considered at the time	Company secretary of company in question
Legal	Any other corporate records which are kept by UK companies	Life of the company plus at least 6 years after striking off	Best practice. Additional 6 years because company can be restored to register up to 6 years after striking off. Prospective liability after that period to be considered at the time	Company secretary of company in question
Legal	Table of UK statutory requirements in relation to company records	Indefinitely	Information required in order to ensure that retention policy is complied with by UK companies	Director of Legal
Overseas offices	Corporate records of overseas companies which are required by local law	Life of the company plus at least the period (if any) during which it can be restored to the register	Statutory requirement. Prospective liability after expiry of period for restoration to be considered at the time	Company secretary of company in question, or the person with equivalent responsibility
Overseas offices	Any other corporate records which are kept by the overseas company	Life of the company plus at least the period (if any) during which it can be restored to the register	Best practice. Prospective liability after expiry of period for restoration to be considered at the time	Company secretary of the company in question, or the person with equivalent responsibility

12. PROPERTY RECORDS

Business Area	Document	Retention Period	Reasons/Comments	Document Owner
Legal /Facilities	Leases, subleases (including where a City & Guilds Group company is the lessor) and related documentation (including planning consents, landlord's consent, surveys)	15 years after expiry, surrender, memoranda of terms or termination	Limitation period	Head of Facilities
Legal /Facilities	Deeds of title to land	Until sold or transferred	Documents of title will be transferred to new freeholder on disposal	Head of Facilities
All	Tender documents, agreements with contractors and consultants	15 years after project completion	Evidence. Limitation period	Project Manger
Legal /Facilities	Planning consents	Until property sold	Business needs	Head of Facilities
Facilities	Surveys and inspections for new buildings and improvements	Indefinitely	Business needs. Evidence	Head of Facilities
Facilities	Architectural reports, building condition and site survey reports, conservation reports (historic and listed buildings), maps, plans and drawings	25 year	Business needs. Evidence	Head of Facilities
Facilities	Structural engineering, mechanical and electrical engineering and drainage services reports	15 years	Business needs. Evidence	Head of Facilities
Facilities	Healthy and safety files in relation to construction projects	Indefinitely	Required under the Construction (Design and Management) Regulations 2007	Head of Facilities