

Data Retention Policy

1. Purpose

To document how long we retain data for and our processes for removing data from our systems.

2. Scope

The people responsible for this Data Retention Policy are Susie Hewitt (Founder and Director) and Katie Gill (Academic Administrator) - collectively known as the Management Team.

3. Our Data Sets

3.1 The Institute is Data Controller for personal data relating to the following groups of people:-

- Trainees on our 4-year Training
- Applicants to our 4-year Training
- External Trainers
- Employees
- Consultants
- Delegates
- People who enquire about our training or courses
- Job applicants

3.2 For the purposes of this Policy the above groups of people are described as Data Sets.

3.3 Different Retention Periods apply to the different Data Sets because we are committed to only retaining information for as long as is necessary for the purposes for which it is processed by us in accordance with UK GDPR.

4. Retention Periods

4.1 Trainees on our 4-year Training

4.1.1 The bases for collecting data for Trainees on our 4-year Training is *consent* and *contract*.

4.1.2 We retain data relating to Trainees on our 4-year Training for the entirety of their training with us plus 7 years after they have finally graduated.

4.1.3 Where a Trainee has left our training prior to the end of the 4-year course (this does not include temporary deferrals) we will retain data for a period of 7 years after they have officially left the course. At the time that they officially leave we will advise them that their data will be retained by us for a period of 7 years but that we will not necessarily be keeping their data up to date. We will offer to provide them with their student records (the personal data) in case they wish to recommence their training with a different provider at a later date.

4.2 Applicants to our 4-year Training

4.2.1 The bases for collecting data for Applicants to our 4-year Training is *consent*, *contract* and *legitimate interests*.

4.2.2 We retain data relating to Applicants to our 4-year Training until the cohort for which they have applied has enrolled (normally within 12 months of their application).

4.2.3 However, we may retain basic contact details such as their name and email address for marketing purposes. This is because, they may choose not to join the next cohort but may wish to be considered for later cohorts and it is in our legitimate interests that we are able to continue to market to them after application.

4.3 External Trainers

4.3.1 The bases for collecting data for External Trainers is *consent* and *contract*.

4.3.2 In general, we do not retain extensive data relating to External Trainers within our systems.

4.3.3 We will retain details of External Trainers indefinitely on the basis that we may contact them to request that they deliver training on behalf of our organisation.

4.3.4 In the event that we are notified that an External Trainer is no longer able to deliver training on behalf of our organisation we would seek to remove their data from our system within a period of 7 years after they have last delivered training on our behalf. However, it may not be possible to entirely remove External Trainer details (particularly their name) from training materials where they are to be credited with creating/ writing or contributing to the same.