



RETENTION AND DISPOSAL POLICY

REVIEWED: June 2023

NEXT REVIEW DATE: June 2024

REVIEWED BY: Billy Jackson

1. INTRODUCTION

The purpose of this policy is to detail the procedures for the retention and disposal of information to ensure that we carry this out consistently and that it is documented.

2. REGISTRATION AND RETENTION OF CANDIDATE INFORMATION

When we register a candidate, their information is held on our software system called matchmaker and e-mails. (And only on e-mails when required, e.g. references when returned).

ARCHIVING OF CANDIDATE INFORMATION

When a candidate no longer requires work through us we archive a folder. The process for this is that we change the status of the candidate file on the system to archived so they are not regularly contacted. A note is logged on the contact log as to why the folder has been archived, the archive date is written on the physical folder, any DBS copies are removed from the candidate folder and placed in a separate folder, any copies of the DBS held on our system are also moved into a separate folder and the physical folder is placed into our lockable archive cabinet as DBS copies are only held for 6 months after the last recruitment decision.

For candidates on Matchmaker, the process is the same and after 2 years from their last assignment date, the majority of their personal data and documents will have been removed. We must retain specific data under Conduct of Employment Agencies and Employment Businesses Regulations 2003 and safeguarding guidelines for all candidates who have been cleared for work for 7 years from their last assignment.

This includes:

- Name/Address
- Terms of Engagement
- Booking Confirmations and Booking History with school names/dates
- Qualifications and Training for the role they have completed
- Any causes for concern/allegation record during this time (to be held securely by DPO)

3. REVIEWING OF CANDIDATE INFORMATION

The compliance team checks the folders holding the candidate's DBS information both on the system and in the cupboard monthly and deletes/places in the shredding box the DBS after 6 months of the candidate being archived.

Weekly, the compliance team go through the cabinets removing candidate folders who were archived over a year ago (checking this by the archive date written on the folder and double checking the archive date logged on our system) and scanning in the contents of their folder to be held on our system for further year.

4. STOPPING CONTACT WITH CANDIDATES

After the two-year retention period of candidate information, we remove document copies and completed forms, references etc. After this stage, the candidate's documents are no longer accessible online. As mentioned above in point 3, we retain certain information for safeguarding reasons. The records retained are listed above.

If a candidate asks to not be contacted and their information to be removed we delete their contact details, CV and any identifiable information from their candidate record we hold on the system.

On all emails we send we have the line "If you want to opt out from receiving marketing emails from us please email info@create-education.co.uk with the subject title **MARKETING OPT OUT**" This email is checked daily and requests acted upon quickly. We then untick their GDPR preferences for marketing, which is time and date stamped. This blocks any marketing material being sent to that candidate. However we still hold the physical copy of their information for the two years required by Compliance Plus for safeguarding reasons.

5. OTHER INFORMATION HELD

We also hold a variety of other information which we keep secure. Client information is held on our system on matchmaker which can only be accessed by individuals working for Create Education by logging onto their computers and then logging into the system with a password.

Internal Payroll and HR documents for Create Employees are held in a HR drive only accessible by the Directors and HR manager additionally in physical folders which are kept securely. We have an old database system (RDB) that is no longer in use for contacting clients and candidates but continues to be used for providing work dates and is accessible only on one secure drive with limited access.