Ginger Nut Training.

Document Title

Data Retention & Destruction Policy

Originator

Sarah Osborne

Responsible Person

Sarah Osborne

Date of Approval

April 2025

Policy Due for Renewal

February 2026

Version 1.1

ginger **nut** ®

Ginger Nut Training – Data Retention & Destruction Policy

Purpose
This policy defines the activities associated with providing data retention and destruction policies and plans that protect Ginger Nut Training's information systems, networks, data, databases, and other information assets.

Scope
This policy applies to all Directors, Associates, Personnel, and Learners of Ginger Nut Training.

Statement of Compliance
Ginger Nut Training is committed to protecting the rights and privacy of individuals in accordance with the Data Protection Act 2018 and the Government record-keeping and retention information for training providers guidance.

Data Retention and Destruction Strategy
The administration department is responsible for managing all data retention and destruction activities. Key activities include:

1. Developing comprehensive data retention and destruction plans.

2. Identifying and training data retention and destruction teams.

3. Planning and documenting data retention and destruction policies.

4. Scheduling updates and conducting training.

5. Executing data retention and destruction plan exercises.

6. Designing and implementing maintenance activities.

7. Preparing for management review and auditing.

8. Updating policies in line with new regulations.

9. Ensuring all employees are aware of their roles and responsibilities.

Data Retention and Destruction Plans
- **Emails**: All shared emails with attachments will be set to automatically delete after six years.

- **Archived Learner Portfolios**: Delete archived learner portfolios on OneFile from the year ending two years previously each August. Evidence of deletion by OneFile will be saved to the Learner Archive.

- **Historic Paper Files**: If confirmed as an ESF learner, store ESF learner files in a locked environment until 2034; destroy previous paper files securely.

2

- **SharePoint Data**: Categorise data into non-personal, ESF learner/client data, and levy learner/client data with specific retention periods.

Equipment Destruction

Wipe and destroy equipment used to access Ginger Nut Training's SharePoint or OneFile system once no longer in use.

Detailed Data Destruction Process

1. **Pulling Reports**

   o **When**: Annually at the end of the academic year (31st July) for learners who completed two years prior.

   o **What to Delete**: OneFile e-portfolios (2 years from the apprenticeship certificate or exit paperwork date), SharePoint & paper records (6 years from the end of the financial academic year).

2. **Organising the Archive**

   o **SharePoint**: Locate the Learner Archive folder, create a new Excel document using the template, and add it to the Reports folder.

   o **OneFile Report**: Pull a report in OneFile, filter by the year, and add the OneFile User ID to the spreadsheet.

3. **Completing the Destruction Dates**

   o Identify if the learner was a Completer, Early Leaver, or Non-Starter.

   o Record OneFile and SharePoint deletion dates in the spreadsheet.

4. **Moving Files to Archive**

   o **SharePoint Folders**: Move learner folders to the Learner Archive folder and rename them appropriately.

   o **Paper Record Storage**: Store paper files in the drawer labelled with the year due for destruction.

5. **Removing Learners from Systems**

   o Use the removing learners from systems spreadsheet to track removals from Cognassist, LinkedIn Learning, Smart Screen, etc.

6. **Check for Other Documents**

   o Check the Apprentices Information and Training folders for any apprentice information and move it to the Learner Archive folder.

7. **Deleting Digital Records**

- o **OneFile E-Portfolio Deletion**: Create an Excel document listing learners for deletion, email OneFile requesting deletion, and save the confirmation email. Evidence of deletion by OneFile will be saved to the Learner Archive.

  - o **SharePoint Folder Deletion**: Request TCS to delete folders reaching the 6-year mark and save the confirmation email. Evidence of deletion by TCS will be saved to the Learner Archive folder.

8. **Paper Record Destruction**

   - o Use the Disposal of Paper Records template to record shredding dates and learner details, and store the document in Paper Record Destruction Evidence.

9. **Updating Spreadsheets**

   - o Update the spreadsheet with deletion/destruction dates and copy this information into the Placement folder.

TCS Contact Details
For assistance with SharePoint deletions and other support, please contact TCS:

- **Phone**: 01206 576043

- **Email**: **Support@tcssupport.co.uk**

- **Website**: www.tcssupport.co.uk

Glossary of Terms
- **ESF: European Social Fund**

  - o Rules apply to providers who have a contract to deliver training to employers who don't pay the levy. These providers may be accessing funding that can be used as match funding for the European Social Fund (ESF).

- **Levy: Government Apprenticeship Levy**

  - o The government apprenticeship levy is a tax paid by employers. It is then stored in a fund which can be accessed to help pay for apprenticeship training costs. It applies to those with a payroll of more than £3 million (the apprenticeship threshold).

- **OneFile**: Learner E-portfolio and learning software.

- **SharePoint**: Microsoft Office web-based collaborative platform, used to store all learner and client data.

Definitions
- **Data Destruction**: The process of permanently deleting or destroying data so that it is irretrievable.

- **Confidential Data**: Any data classified as personal, sensitive, or proprietary under data protection laws (e.g., GDPR).

- **Media**: Devices or formats used to store data, including hard drives, SSDs, USB drives, CDs/DVDs, paper documents, and cloud storage.

Data Types and Retention

Data will only be retained for as long as necessary in line with the Data Retention Policy. When it is no longer required, it must be destroyed according to the procedures outlined in this policy.

Destruction Methods

Electronic Data

- **File Deletion**: Use secure deletion software (e.g., DBAN, Eraser, BitRaser) that overwrites files to prevent recovery.

- **Disk Wipe**: Physically wipe or degauss hard drives before disposal or reuse.

- **Cloud Data**: Delete data from cloud services and verify that deletion is irreversible per the provider's protocols.

Physical Data

- **Paper Records**: Shred using a cross-cut shredder.

- **Optical Media (CDs/DVDs)**: Physically destroy by shredding or breaking.

- **USB Drives & Flash Media**: Use secure erasure tools and/or physically destroy.

Responsibility

- **TCS Support and Administration Team**: Responsible for secure disposal of electronic media and systems.

- **Senior Administrative Coordinator & HR Administrator**: Ensure that staff follow data destruction procedures.

- **All Staff**: Must adhere to this policy and report any data destruction issues or delays.

Documentation & Verification

All data destruction activities must be logged and retained for audit purposes, including:

- Type of data destroyed

- Method of destruction

- Date

- Person responsible

Certificates of destruction should be obtained from third-party service providers when applicable.

Third-Party Data Destruction

When using external vendors for data destruction:

- Vendors must sign confidentiality and compliance agreements.

- Vendors must provide proof of secure destruction (certificate of destruction).

- Vendors must comply with relevant data protection regulations.

Policy Violations

Non-compliance with this policy may result in disciplinary action, up to and including termination, and legal consequences as per applicable data protection laws.

Review and Updates

This policy will be reviewed annually or upon significant changes in regulations or operational procedures.

Sarah Osborne
Sarah Osborne (Apr 14, 2025 10:47 GMT+1)

Harry Simpson
Harry Simpson (Apr 15, 2025 09:01 GMT+1)

Ginger Nut Training – Data Retention & Destruction Policy

Final Audit Report

2025-04-15

Created:	2025-04-14
By:	Ginger Nut Training (delivery@gingernuttraining.co.uk)
Status:	Signed
Transaction ID:	CBJCHBCAABAA2eiu6Mdw3gh5rrUaPxqgk8jzgU2tSNxD

"Ginger Nut Training – Data Retention & Destruction Policy" History

Document created by Ginger Nut Training (delivery@gingernuttraining.co.uk)
2025-04-14 - 9:42:03 AM GMT

Document emailed to Sarah Osborne (sarah.osborne@gingernut.co.uk) for signature
2025-04-14 - 9:43:05 AM GMT

Document emailed to Harry Simpson (harry.simpson@gingernutmedia.com) for signature
2025-04-14 - 9:43:05 AM GMT

Email viewed by Sarah Osborne (sarah.osborne@gingernut.co.uk)
2025-04-14 - 9:47:06 AM GMT

Document e-signed by Sarah Osborne (sarah.osborne@gingernut.co.uk)
Signature Date: 2025-04-14 - 9:47:30 AM GMT - Time Source: server

Email viewed by Harry Simpson (harry.simpson@gingernutmedia.com)
2025-04-15 - 8:01:21 AM GMT

Document e-signed by Harry Simpson (harry.simpson@gingernutmedia.com)
Signature Date: 2025-04-15 - 8:01:37 AM GMT - Time Source: server

Agreement completed.
2025-04-15 - 8:01:37 AM GMT