



# Data Retention Policy

1. This policy is Doctore On Track Training Services Ltd's Data Retention Policy:
  - 1.1. This policy has been designed to help ensure that the Company complies with legal obligations in relation to the retention and deletion of personal data.
  - 1.2. Personal data that Doctore On Track Training Services Ltd processes for any purpose shall not be kept for longer than is necessary.
  - 1.3. **General:** Doctore On Track Training Services Ltd shall retain and delete personal data as follows:
    - (a) Account Data shall be retained for 3 years following the date of the last contact or dealing with you, at the end of which period it will be deleted from Doctore On Track Training Services Ltd systems.
    - (b) Profile data (other than profile data which is also account data) shall be retained for 3 years following the date of last contact or dealing with you, at the end of which period it will be deleted from Doctore On Track Training Services Ltd systems.
    - (c) Contact data (other than the contact data which is also account data) shall be retained for 2 years following the date of last contact dealing with you, at the end of which period it will be deleted from Doctore On Track Training Services Ltd systems.
    - (d) Usage data shall be retained for 2 years following the date of last contact or dealing with you, at the end of which period it will be deleted from Doctore On Track Training Services Ltd systems.
    - (e) Enquiry data (other than the enquiry data which is also account data) will be retained for 2 years following the date of last contact or dealing with you, at the end of which period it will be deleted from Doctore On Track Training Services Ltd systems.
    - (f) Transaction data shall be retained for 2 years following the date of last contact or dealing with you, at the end of which period it will be deleted from Doctore On Track Training Services Ltd systems.
    - (g) Notification data (other than notification data which is also account data) shall be retained for 2 years from the date of last contact or dealing with you, at the end of which period it will be deleted from Doctore On Track Training Services Ltd systems.
    - (h) Correspondence data (other than correspondence data which is also account data) shall be retained for 2 years from the date of last contact or dealing with you, at the end of which period it will be deleted from Doctore On Track Training Services Ltd systems.
    - (i) All training and assessment records will be retained for a period of no less than seven (7) years from the date of creation and/or amendment



2. **SQA related activity only:** As an SQA centre delivering Ofqual approved qualifications we are required to keep, for one calendar year, the following records:

- List of candidates registered with SQA for each qualification
- Learner details (date of birth, address, gender, ethnicity, reasonable adjustments and special considerations)
- Assessor Name
- IQA Name (if sampled)
- Achievement dates
- Learner achievement/Certificates claimed
- IQA Reports (if sampled)
- Evidence files or portfolios (see below for retention periods)
- Assessment records/plans (see below for retention periods)

**These records must be made available to the external verifier and SQA on request.**

**Records must be stored securely and in a retrievable format.**

**If an investigation of suspected malpractice is carried out:**

**You must retain related records and documentation for three years for non- regulated qualifications (six years for regulated qualifications. See Requirements for regulated qualifications below)**

**If an appeal to SQA against the outcome of a malpractice investigation is made:**

**Assessment records must be retained for six years.**

**If an investigation involving a potential criminal prosecution or civil claim is carried out:**

**Records and documentation must be retained for six years after the case and any appeal has been heard.**

**If there is in any doubt about whether criminal or civil proceedings will take place, your centre should keep records for the full six year period.**

2.1. All records of assessment must be complete, securely stored and available for external quality assurance and auditing purposes as these are the basis on which certification is made. However candidate's portfolios and samples of work are not required to be retained for the same time period and they will be retained for the following time periods:

2.2. Assessment Evidence when selected for external verification visit

The candidate assessment evidence for the selected units must be retained for the qualification verification visit or central verification event. This may be physical evidence or records of the evidence (where the evidence is ephemeral or short lived)

2.3. Assessment Evidence when an appeal has been made



In the case of an appeal to SQA against an internal assessment result records (including all materials and candidate evidence) must be retained until the appeal has been resolved. Thereafter all assessment and internal verification records should be retained for six years.

#### 2.4. Assessment Evidence where an investigation of malpractice has been carried out

If an investigation of suspected malpractice is carried out records must be retained for six years (regulated qualifications) or 3 years (non-regulated). Records will include any candidate work and assessment or verification records relevant to the investigation. In an investigation involving a criminal prosecution or civil claim, records and documentation will be retained for six years after the case has been heard. In the case of an appeal to SQA against the outcome of a malpractice investigation, assessment records must be retained for six years.



3. **CPCS related activity only:** Doctore on Track Training Services keeps accurate records of all documentation for six years (unless otherwise stated) in a specific CPCS Test Centre File including:

- CPCS Technical Tests and/or On-Site Assessment that the company carries out at the Test Centre including grading and sign-off sheets;
- The completed double-sided CPCS Terms & Conditions and Data Protection Statement;
- Copies of the LGV licence for Candidates applying for Concrete Pump-Truck Mounted Boom (A06) and Vacuum Excavator – LGV – Semi powered arm and LGV Fully powered arm (A78 E & F);
- Record of Category Experience;
- Copies of completed CPCS Card application forms submitted to NOCN Job Cards, for a period of 90 days, following which they should be destroyed securely

3.1. Management system information;

- NOCN Job Cards Quality Assurance and audit reports;
- Risk assessments, policies and procedures
- Insurance documentation;
- Agreements with any third party NVQ providers for delivery of NVQs;

3.2. All records and documents shall be clear, legible and fully completed by the appropriate person for a particular task. For example, it is the responsibility of the Test Centre that CPCS Technical Test papers are only completed and signed by the CPCS Tester conducting the test.

3.3. For quality assurance purposes, the centre provides facilities to record and view video and digital camera images and to listen to digital audio recordings that relate to CPCS Technical Tests and On-Site Assessments

4. Notwithstanding the other provisions of this policy, Doctore On Track Training Services Ltd may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person e.g. NSAR, NR and RTAS requirement to maintain records for 7 years.

Doctore On Track Training Services Ltd may update this policy upon its annual review and any changes will be notified

All personnel reserve the right to access any data and records retained as requested

Signed

A handwritten signature in black ink, appearing to be "K. B.", written over a horizontal line.

Managing Director

31<sup>st</sup> December 2024