



P4 S1.12 Data Retention - Control of Records Policy and Procedure



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PURPOSE AND POLICY CONSIDERATIONS

Forus Training’s Document Control Policy detailing the control of all documents that relate to the requirements of our Quality Management System.

Our purpose for authoring a Document Control Policy is to:

1. Identify the personnel with the authority for approving documents,
2. Define how obsolete documents are managed by our document management systems,
3. Set out how documents are identified and assigned document codes,
4. Identify the personnel with the authority to approve changes and how document changes are tracked,
5. Identify how external documents in use at Forus Training are controlled.

DEFINITIONS

Records can be held in a variety of physical forms including: paper documents including both written and printed matter, electronic records (i.e. word processing files, database, spreadsheet files, emails, electronic data on any media, etc.) drawings, photographs or anything on which information is recorded.

Records created or received can be classified into the following groupings:

- **Publicly accessible** - Aggregate scores / gender breakdown appear on QQI website infographics,
- **Provided by private person themselves** - ID, PPS, DOB, Gender, Contact Information, Proof of Identification,
- **Private person “behaviour”** (out of own systems) - Attendance patterns Registers/Roll books ☒,
- **Derived data** - Scores, results, grade 7 8,
- **3rd party providers at each stage** - QQI.

Records Management is the systematic collection, classification, indexing, retention and disposal of records (paper or electronic).



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SCOPE

This policy and procedure apply to all records created or received by staff in the course of their duties on behalf of the service and retained as evidence of the activities of the service.

¹

Standard Data Processing Agreements are in place for those including employees, contractors, consultants, temporaries, and other workers at Forus Training, including all personnel affiliated with third parties.

[P4 S1 Standard Data Processing Agreement for Trainer](#)

This policy applies to all records detailed above categorised by grouping.

CONTROL OF RECORDS – POLICY STATEMENT

It is Forus Training's policy that records created should be both accurate and complete. They must provide evidence of the function or activity they were created to document. In order to be evidential, records must be authentic, reliable, have integrity and be usable. An authentic record is one that can be proven to be what it purports to be. Records should be dated, timed and signed. They should be placed into the document management system on Forus Training's Management Information System and coded in line with naming conventions so as to form part of the retention schedule so that they are protected against unauthorised addition, deletion or alteration.²

PROCEDURES AND PRACTICES

A reliable record is one that can be trusted to be an accurate representation of a function or action taken. Therefore, records should contain all relevant facts and be created at the time of the action or transaction or as soon as possible afterwards by a person authorised to carry out that function, action or transaction. The integrity of a record refers to it being complete and unaltered. Once created, additions or annotations to the record can only be carried out by those authorised to do so and any amendment should be explicitly indicated on the record.

A usable record is one that can be located, retrieved, presented and interpreted or read whenever or wherever there is a justified need for that information. Records are traceable within the Document Management System (DMS) and are filed in the format First Name, Last Name, Contact ID, Event ID this forms a unique index reference, which is readily searchable, to ensure the record is associated with its correct file.

Records retained are an electronic copy of the original; they have programme delivery, legal, fiscal or administrative purposes.

Records are created by Forus Training's staff and trainers to:

- Record events and incidents,
- Enable the public to access information about programmes and services,
- Support the communication of information between staff and trainers regarding the delivery of services,
- Facilitate sharing of information between staff and trainers to ensure that appropriate support is planned for and provided,

¹ The Pre-Hospital Emergency Care Council, Quality Review Framework Standard STN020 V4 May 2024 - Criteria 3.2: Each course delivered by the Institution is supported by adequate numbers of faculty.

² The Pre-Hospital Emergency Care Council, Quality Review Framework Standard STN020 V4 May 2024 - Criteria 1.7: The Institution ensures confidentiality, and that the security of data is protected.



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- Enable management to monitor the work of staff and give appropriate advice, support and direction where required,
- Enable information to be collected to provide a basis for evaluating programme and service delivery, managing resources and future planning,
- Provide a means of accountability to whoever is entitled to it, so that actions and decisions that have been taken can be understood and justified in the context of legislation, professional standards, guidelines, evidence, research and professional and ethical conduct,
- Provide information that may be needed as evidence in court proceedings, internal and external audit and monitoring, complaints and investigations.

Records retained should be;

- Legible with clear handwriting or type and written in black ink so that they can be easily read and reproduced when required,
- Written using simple language, which is clear and meaningful, so that the report can be readily understood by those who have a legitimate reason to access it. The record must not include jargon, meaningless phrases, irrelevant speculation and offensive, subjective statements. If using abbreviations, they must be from an agreed abbreviation list,
- Made as soon as possible after the event to which they relate, (if the date and time of the event differs from that of when the records are written up, this should be clearly noted). The record must demonstrate the chronology of events and all significant consultations, assessments, observations, decisions, interventions and outcomes,
- Accurately dated, timed and signed with the staff member's name printed legibly underneath the signature together with their staff title,
- Clear regarding the lawful basis for processing Data (General Data Protection Regulations (GDPR)),
 - Consent,
 - Under contract with a legal obligation – employer/employee,
 - Compliance with a legal obligation – required under law.

Records Management System

Forus Training's Record Management System is electronic, this is one authoritative source for up-to-date reliable information.

Forus Training has in place a robust process to manage the co-existence of paper and electronic records until they are digitised in a timely manner within 7 working days.

Record Retention Periods

This document sets out guidelines in relation to record retention periods in Appendix 2

Reporting from the Management Information System -

Forus Training's information Management system supports the collection of statistical data relating to completion rates; it is possible to set criteria as to how this data is queried, the reports cater for a wide variety of situations and eventualities.

The reports feature enables:

- Reports that are relevant to measurement of KPI's,
- The export of information to an Excel spreadsheet or CSV,
- Triggering of reporting so that regular "status updates" can be scheduled to management



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- 3.

RELATED POLICIES PROCEDURES AND FORMS

P4 S 10 Field Justification

REFERENCES, SUPPORTING DOCUMENTS AND RELATED LEGISLATION

Retention periods for specific records are set out in legislation,

- Companies Acts;
- Revenue Commissioners Guidelines;
- The Terms of Employment Act, 1994;
- Organisation of Working Time Act 1997 and 2011;
- Parental Leave Acts 1998-2006;
- Safety, Health & welfare at Work (General Application) Regulations 1994 & 2007; • Worker Protection (Regular part-time employees) Act 1991.
- The General Data Protection Regulation 2016/679

WHO MUST OBSERVE THIS POLICY

All Stakeholders are informed about this Document Control Policy at induction

Appendix 1 - Sample - The management of attendance records

Procedure for monitoring learner attendance

1. Go to Information Management System (IMS) and find the event on search bar,
2. Click on the students tab,
3. To check the attendance, click on the attendance tab above the learner names,
4. The percentage of attendance appears next to the learner name, also it is available checking the sessions that the learner attended in green and absence in red colour,
5. If you would like to check the attendance by date go to the options tab on the students page then click Record Attendance button then the attendance screen appears by dates of the events.

* Checking the previous day's event report to get the list of events.

* Attendance sheets are sent the same day or next day by the tutor to accounts email address.

* Attendees sign the attendance sheet if they attend. The tutor signed and dated the form and emailed it to the account's email address.

* Checking the event number, location, session number on attendance sheets then marked the learners who attended the event and marked the absence with red X on Administrative.

If the learner is absent for 2 weeks, Learners are sent the PAT (Poor Attendance Template) template from Administrative.

* Forwarding the learner reply to the tutor and the departments in the office.

³ The Pre-Hospital Emergency Care Council, Quality Review Framework Standard STN020 V4 May 2024 - Criteria 3.6: The Institution ensures that PHECC course delivery is effectively recorded, and QA monitored.



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Where are attendance sheets filed?

- * The attendance sheets are scanned every 15 days and saved in the event folder in Administrative database and then attached with the tutor invoice and kept in tutor folders.
- * The original attendance sheets were sent to the office by the tutor, after the event was completed. All attendance sheets are scanned and stored the same way above into the Administrative Database.

Any infractions of this policy will not be tolerated and management will act quickly in correcting the issue if the ethical code is broken.

This policy is applied to Classroom, Blended and Fully Online programmes.



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Appendix 2

Marketing - Lead Staging Life-cycle	
Commencement	
P9 Learning Life-cycle	Aggregate scores / gender breakdown appear on QQI website Infographics

Source	Provided by private person themselves	Default retention Period	Final Disposition	Source of Guidance
Purpose				
Marketing - Lead Staging Life-cycle	Interests, Questions asked	7 7 years (6 years in which to take a claim against Forus Training, plus 1 year for proceedings to be served on Forus Training)	Ⓒ Confidential Shredding - Great White - Certificate log	
	Learner Requirements – Goals Hopes and Dreams	7 7 years (6 years in which to take a claim against Forus Training, plus 1 year for proceedings to be served on Forus Training)	Ⓒ Confidential Shredding - Great White - Certificate log	
	Email address, Contact telephone number(s) Job Title, Home Address - See lead staging	7 7 years (6 years in which to take a claim against Forus Training, plus 1 year for proceedings to be served on Forus Training)	Ⓒ Confidential Shredding - Great White - Certificate log	
Commence ment	ID, PPS, DOB, Gender, Contact Information,	7 7 years (6 years in which to take a claim	Ⓒ Confidential Shredding - Great	



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	Proof of Identification	against Forus Training, plus 1 year for proceedings to be served on Forus Training)	White - Certificate log	
	Training Needs Analysis: Job Title, Professional experience, Educational Qualifications	7 7 years (6 years in which to take a claim against Forus Training, plus 1 year for proceedings to be served on Forus Training)	☒ Confidential Shredding - Great White - Certificate log	
	Professional Qualifications Professional experience	7 7 years (6 years in which to take a claim against Forus Training, plus 1 year for proceedings to be served on Forus Training)	☒ Confidential Shredding - Great White - Certificate log	
	Programme on which currently enrolled (learner representative) role Disciplines of expertise			
	Credit / Debit Card details 1	1 Delete immediately		
	Bank details in the case of Direct Debits / Refunds			
P9 Learning Life-cycle	Correspondence			
	Registration Forms 7 ☒	7 ☒ Retain for 7 years (6 years in which to take a claim against Forus training, plus 1 year for proceedings to be served on Forus training)	☒ Confidential Shredding - Great White - Certificate	
inc. Access Transfer and Progression	Name of Programme			



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Award type, Award Name, Award Code, Award Year of programme				
Date of commencement,				
Number of Years completed				
Entry standard to programme Highest qualification				
Garda vetting form & outcome - Learners ① Ⓢ	① Delete immediately	Ⓢ Confidential Shredding - Great White - Certificate		
Psychological assessments ②				
Special Education Needs' files, reviews, correspondence ②				
Individual Education Plans ②				
Sensitive Learner information - Accident reports ②				
Sensitive Learner information - Records of complaints Ω or ⑦* Ⓢ	⑦ Ⓢ Retain for 7 years (6 years in which to take a claim against Forus training, plus 1 year for proceedings to be served on Forus training)	Ⓢ Confidential Shredding - Great White - Certificate		
Application for Extensions including supporting evidence ⑦ Ⓢ	⑦ Ⓢ Retain for 7 years (6 years in which to take a claim against Forus training, plus 1 year for proceedings to be served on Forus training)	Ⓢ Confidential Shredding - Great White - Certificate		
Late Submission Applications ⑦ Ⓢ	⑦ Ⓢ Retain for 7 years (6 years in which to take a claim against Forus training, plus 1 year for proceedings to be	Ⓢ Confidential Shredding - Great White - Certificate		



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		served on Forus training)		
	Sensitive Learner information - Appeal Applications 7 ☹	7 ☹ Retain for 7 years (6 years in which to take a claim against Forus training, plus 1 year for proceedings to be served on Forus training)	☹ Confidential Shredding - Great White - Certificate	
	Fee Status - Exempt - Not Exempt			
	Blended Learning - Zoom Recording	Retain for 3 years to allow for completion of course	Delete from server on the basis of the event schedule	
HR Records Life-cycle	ID, PPS, DOB, Contact Information, Proof of Identification			
	correspondence			
	Unsuccessful Applications & CVs of candidates called for interview 18 ☹	10 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.	☹ Confidential Shredding - Great White - Certificate	
	Unsuccessful Database of applications 18 ☹	10 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.	☹ Confidential Shredding - Great White - Certificate	
	Unsuccessful Selection criteria 18 ☹	10 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.	☹ Confidential Shredding - Great White - Certificate	
	Unsuccessful Applications of candidates not shortlisted 18 ☹	10 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.	☹ Confidential Shredding - Great White - Certificate	



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	Unsuccessful Unsolicited applications for jobs 18 ☒	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.	☒ Confidential Shredding - Great White - Certificate	
	Unsuccessful Candidates shortlisted but unsuccessful at interview 18 ☒	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.	☒ Confidential Shredding - Great White - Certificate	
	Unsuccessful Candidates shortlisted and are successful but do not accept offer 18 ☒	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.	☒ Confidential Shredding - Great White - Certificate	
	Unsuccessful Interview board marking scheme & board notes 18 ☒	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.	☒ Confidential Shredding - Great White - Certificate	
	Unsuccessful Panel recommendation by interview board 18 ☒	18 months from close of competition: 12 months from close of competition plus 6 months for the Equality Tribunal to inform the school that a claim is being taken.	☒ Confidential Shredding - Great White - Certificate	
	Staff personnel files - e.g. applications, qualifications, references, recruitment, job specification FD+7 ☒	FD+7 Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	☒ Confidential Shredding - Great White - Certificate	
	Staff personnel files - contract, records of staff training etc. FD+7 ☒	FD+7 Retain for duration of employment (Finish Date FD) plus 7 years (6	☒ Confidential Shredding - Great White - Certificate log	



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		years in which to take a claim against the company plus 1 year for proceedings to be served on the company)		
	Staff personnel files - Application &/CV FD+7☒	FD+7☒ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	☒ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Qualifications FD+7☒	FD+7☒ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	☒ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - References FD+7☒	FD+7☒ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	☒ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Interview: database of applications (section relating to the employee only) FD+7☒	FD+7☒ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	☒ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Emergency contact FD+7☒	FD+7☒ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	☒ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Selection criteria FD+7☒	FD+7☒ Retain for duration of employment (Finish Date FD) plus 7 years (6	☒ Confidential Shredding - Great White - Certificate log	



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		years in which to take a claim against the company plus 1 year for proceedings to be served on the company)		
	Staff personnel files - Interview board marking scheme & board notes FD+7☒	FD+7☒ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	☒ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Panel recommendation by interview board FD+7☒	FD+7☒ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	☒ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Recruitment medical FD+7☒	FD+7☒ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	☒ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Job specification/ description FD+7☒	FD+7☒ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	☒ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Contract/Conditions of employment FD+7☒	FD+7☒ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	☒ Confidential Shredding - Great White - Certificate log	
	Probation letters/forms FD+7☒	FD+7☒ Retain for duration of employment (Finish Date FD) plus 7 years (6	☒ Confidential Shredding - Great White - Certificate log	



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		years in which to take a claim against the company plus 1 year for proceedings to be served on the company)		
	Staff personnel files - POR applications and correspondence (whether successful or not) FD+7Ⓢ	FD+7Ⓢ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	Ⓢ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Leave of absence applications FD+7Ⓢ	FD+7Ⓢ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	Ⓢ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Job share FD+7Ⓢ	FD+7Ⓢ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	Ⓢ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Career Break FD+7Ⓢ	FD+7Ⓢ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	Ⓢ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Maternity leave FD+7Ⓢ	FD+7Ⓢ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	Ⓢ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Paternity leave FD+2 or FD+7Ⓢ	FD+7Ⓢ Retain for duration of employment (Finish Date FD) plus 7 years (6	Ⓢ Confidential Shredding - Great White - Certificate log	



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		years in which to take a claim against the company plus 1 year for proceedings to be served on the company)		
	Staff personnel files - Parental leave** ⑧ or FD+②Ⓢ	**Must be kept for 8 years - Parental Leave Act 1998	Ⓢ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Force Majeure leave ⑧ or FD+②Ⓢ	**Must be kept for 8 years - Parental Leave Act 1998	Ⓢ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Carers leave*** ⑧ Ⓢ	***Must be kept for 8 years - Carer's Leave Act 2001	Ⓢ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Working Time Act (attendance hours, holidays, breaks)**** ⑦ Ⓢ	FD+⑦Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	Ⓢ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Allegations/complaints Ω	Ω Depends entirely on the nature of the complaint. If it is child-safeguarding, a complaint relating to instructor-handling, or an accident, then retain indefinitely. Never destroy.		
	Staff personnel files - Grievance and Disciplinary records***** ⑦ Ⓢ	FD+⑦Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	Ⓢ Confidential Shredding - Great White - Certificate log	*****note the relevant HR policy re Disciplinary Procedures in relation to the period of time for which a warning remains "active" on an employee's record.
	Staff personnel files - Sickness absence	FD+⑦Retain for duration of employment (Finish Date FD) plus 7 years (6	Ⓢ Confidential Shredding - Great	



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	records/certificates 7 ☹ or ☐	years in which to take a claim against the company plus 1 year for proceedings to be served on the company)	White - Certificate log	
	Staff personnel files - Pre-employment medical assessment 7 ☹ or ☐	FD+7 ☹ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company) or ∞ Retain indefinitely Never destroy	☹ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Occupational health referral 7 ☹ or ☐	FD+7 ☹ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company) or ∞ Retain indefinitely Never destroy	☹ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Correspondence re retirement on ill-health grounds 7 ☹ or ☐	FD+7 ☹ Retain for duration of employment (Finish Date FD) plus 7 years (6 years in which to take a claim against the company plus 1 year for proceedings to be served on the company) or ∞ Retain indefinitely Never destroy	☹ Confidential Shredding - Great White - Certificate log	
	Staff personnel files - Accident/injury at work reports 10 or FD+7 ☹	10 or FD+7 ☹ Retain for 10 years, or the duration of the employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), whichever is the greater (unless sickness absence relates to an accident/	☹ Confidential Shredding - Great White - Certificate	



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		injury/ incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy).		
	Staff personnel files - Medical assessments or referrals 10 or FD+7	10 or FD+7 Retain for 10 years, or the duration of the employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), whichever is the greater (unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy).	Confidential	Shredding - Great White - Certificate
	Staff personnel files - Sick leave records (sick benefit forms) 10 or FD+7	10 or FD+7 Retain for 10 years, or the duration of the employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), whichever is the greater (unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy).	Confidential	Shredding - Great White - Certificate



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Accounting records		6 Years		
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⁴ The Pre-Hospital Emergency Care Council, Quality Review Framework Standard STN020 V4 May 2024 - Criteria 3.8: The Institution ensures an effective faculty competence monitoring and feedback system is in place.



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Amendment History			
Amendment summary sheet			
Revision	Date	Amendment summary	Training Requirements
	16/12/2020	Initial release	Read and Review
002	02/03/2022	Reviewed and approved	
003	04/09/2024	Reviewed and Updated to reflect Fully Online delivery	
004	26/02/2025	Updated to address PHECC	