

Crystal&Co Document Retention and Secure Storage Policy

Introduction

Crystal & Co is committed to ensuring that all documents and records are securely stored and retained in line with legal obligations and best practice. As a training and assessment centre, we are required to manage and store documentation in compliance with the Data Protection Act 2018, alongside the requirements of our regulators and awarding organisations.

This policy works in conjunction with our Data Protection Policy to provide clear guidance on the retention, secure storage, and disposal of documents.

Document Storage and Security

All learner and organisational records are stored securely using both electronic and physical storage systems. Candidate files are maintained electronically through secure, encrypted cloud-based systems that adhere to industry-standard security protocols. These systems ensure:

- Protection against unauthorised access.
- Confidential handling of personal and sensitive data.
- Backup and recovery options to safeguard data against loss.

For physical records, secure storage solutions such as locked filing cabinets and off-site storage facilities are used, with access limited to authorised personnel.

Types of Records Retained

We store and manage various records to ensure compliance with regulatory requirements and effective operational management. These include but are not limited to:

- Learner records (e.g., proof of identity, enrolment forms, qualification evidence).
- Assessment and internal quality assurance records.
- Organisational documents such as HR, finance, and contractual agreements.
- Regulatory and compliance-related documentation.

Retention Periods

Crystal & Co retains records for specific durations depending on the nature of the document. In general:

- Learner records are retained for at least 3 years following the completion of their qualification or course.
- HR, financial, and corporate records are kept in line with statutory requirements such as HMRC and Companies House guidelines.

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- Any additional requirements from awarding organisations or regulators are followed when determining retention periods.

Following the expiry of these retention periods, records are subject to secure and compliant disposal.

Document Disposal and Destruction

When records have reached the end of their retention period, they are disposed of securely to ensure the confidentiality of personal and sensitive data. This process includes:

- Permanent deletion of electronic records from our secure cloud systems, including the removal of backups.
- Physical documents are shredded using a secure document destruction service, ensuring the information cannot be reconstructed.
- Any removable media (e.g., USB drives, CDs) are destroyed physically to prevent data recovery.
- Computer equipment and storage devices are wiped in accordance with The Waste Electrical and Electronic Equipment (WEEE) Regulations 2013, ensuring secure disposal.

Under no circumstances will any data or sensitive documents be disposed of through general waste channels.

Review and Compliance

This policy will be reviewed annually to ensure it remains up to date with legal, regulatory, and operational requirements. Any significant changes in data protection laws, industry standards, or internal processes will prompt an immediate review. All staff and relevant stakeholders will be informed of updates to ensure compliance with current practices.

Approval

The undersigned certifies that this policy has been reviewed and approved for implementation within Crystal&Co.

Managing Director

Signature:*Ramona Marcu*.....

Name: Ramona Marcu

Date: 04/09/2025

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