

## Record Retention Policy

OEG Retention Policy – Version 2 – June 2021

Operam Education Group (OEG) and all its subsidiary businesses maintain records in line with our Data Protection Policy and those of the Information Commissioner's Office (our registration number for each brand can be found at the bottom of this policy) to ensure that our business runs efficiently and in order to comply with statutory requirements.

OEG ensures that all records are kept in accordance with the requirements of the Data Protection Act 1998. Extra care is taken with all sensitive and personal data (e.g., information captured in the Equal Opportunities Form, CVs, and our Customer Relationship Management system. We are not required to keep the original of all documents: copies will be stored electronically (and are not alterable). All copies of original documents are verified to confirm that we have seen the original. Where the document contains a photograph of the individual, we also confirm that the document provided is a true likeness to the individual.

Any records that are no longer required are destroyed securely

Document Type	Retention length
Candidate records including application form/CV, ID checks terms of engagement (see below also, details of assignments, opt notices and interview notes for unsuccessful candidates	2 Years from the last date of supply or introduction to any client (Conduct of Employment Agencies and Employment Businesses Regulations 2003 (Conduct Regulations))
Hirer records including client details, terms of business (see below also), assignment/ vacancy details	1 year from the last date of supply or introduction to any client (Conduct of Employment Agencies and Employment Businesses Regulations 2003 (Conduct Regulations))
Terms of Engagement with temporary worker and Terms of Business with clients	6 years to deal with any civil action in the form of contractual claim (Limitation Act 1980).
Staff records including CV, ID, bank details, reference information and other personnel information (e.g. absence & disciplinary records)	2 years from employee termination date
Working time records: 48 hours opt out notice / annual leave records	2 years from the time they were created

Annual appraisal/ assessment records	5 years
References	2 years following the introduction to a client OR 2 years after engagement has ended, whichever is the later
Records held relating to right to work in the UK	2 years after employment or engagement has ended
Criminal record checks	6 months following the introduction to a client OR 2 years after engagement has ended, whichever is later
National Minimum Wage Documentation: Total pay by the worker and the hours worked by the worker <ul style="list-style-type: none"> <li>• Overtime/ shift premium;</li> <li>• Any deduction or payment of accommodation;</li> <li>• Any absences e.g. rest breaks, sick leave, holiday;</li> <li>• Any travel or training during working hours and its length;</li> <li>• Total number of hours in pay reference period – this sets the averaging period to calculate whether a worker has been paid</li> <li>• NMW e.g. workers paid weekly have a pay reference period of one week</li> </ul>	7 years after the end of the pay reference period following the one that the records cover (National Minimum Wage Act 1998) (We must keep them for 6 years in the UK, in order to show that we have paid at least national minimum wage rates if a civil claim is brought against us)
Sickness records – statutory sick pay	7 years
Statutory maternity, paternity, adoption pay	7 years from the end of the tax year to which it relates
Pension auto-enrolment	7 years (including for opt out notices)