

COLLEGE OF INTEGRATED CHINESE MEDICINE DATA RETENTION POLICY OVERVIEW

CICM collects personal data from recruitment and enrolment to when a visitor, patient, student or employee completes their time with the College. We also collect personal data from visitors, patients and when people sign up to courses. In some circumstances, the length of time we hold data is set by law. In other cases, we follow data protection responsibilities under the Data Protection Act 2018 and the retained EU law version of the GDPR (UK GDPR) so that data is stored for “no longer than is necessary for the purpose for which it is processed.”

CICM generally retains and deletes data as follows (these may apply to visitors, patients, students, faculty and staff)

Record type	Recommended retention/review period
Personnel files <i>(including training, disciplinary and working time records)</i>	6 years after employment ceases
References (All)	1 year after reference is given
Right to work/study in the UK checks	2 years after employment/course ends
Recruitment & Enrolment application forms and interview notes for unsuccessful candidates	1 year <i>(successful applicants' or applicants on hold documents will transfer to their personnel or student file)</i>
Redundancy information <i>(calculations of payments, refunds, notification to the Secretary of State)</i>	6 years from date of redundancy

Termination of employment	At least 6 years
Flexible working requests	18 months following any appeal
Statutory Sick Pay (SSP) records (calculations, certificates, self-certificates, occupational health reports and COVID-19-related SSP records)	Six (6) months after the end of the period of sick leave
Statutory maternity/paternity/adoption pay records	Three (3) years after the end of the tax year in which the maternity/paternity/adoption period ends
COVID-19 vaccination records	Until studies or employment ceases
Senior executives' records <i>(senior management team or equivalents)</i>	Indefinitely
CCTV footage	Two (2) weeks or longer [maximum six (6) months where footage may be relevant to a disciplinary matter or unfair dismissal claim]
Driving offences	Six (6) months following the outcome of any formal decision or appeal <i>(information may be relevant to a disciplinary matter or unfair dismissal claim)</i>

Pension records	(Twelve) 12 years after the benefit ceases
Pension scheme investment policies	(Twelve) 12 years from when any benefit payable under the policy ends
DBS checks	A record of whether the DBS check produced a satisfactory or unsatisfactory result is retained. Specific information revealed by the DBS check will be deleted, unless this information is necessary for the ongoing employment or student relationship.
Disciplinary Actions	A disciplinary matter will remain active subject to its severity and at the discretion of the CICM management. CICM will keep a record of all disciplinary matters employee's (or student's) file
Patient Records	Adults (18 years +) All records shall be retained for seven (7) years after patient's last consultation. Children & Young People All records shall be retained until their 25th birthday.
Coronavirus furlough records	Six (6) years from date of completion of furlough period

Income tax and National Insurance records

At least three (3) years from the end of the relevant financial year

Employee Working time records including overtime and annual holiday

Two (2) years from the date they were made.

Deletion of data

When personal data is ready to be destroyed, this is done effectively and securely.

Paper records will be shredded, or destroyed in another secure way, rather than disposed of with general waste.

Electronic records will be removed from CICM IT systems.