



Data Retention Policy and Schedule

This is the Data Retention Policy of Elite Services Limited, Elite Services Home to School Transport Limited, Elite Services Driver Training Limited, Carsville Coaches Limited and Freedom Travel North Limited trading as Smiths of Marple.

1. Introduction

We recognise that in the running of our business, we collect and process personal data from a variety of sources. This personal information is collated in several different formats including letters, emails, legal documents, employment records, operations records, images and statements. The personal data is held in both hard copy and electronic form. This policy covers all the personal data that we hold or have control over. It also covers data that is held by third parties on our behalf, for example cloud storage providers or offsite records storage.

2. Aims of the policy

Our business will ensure that personal data that we hold is kept secure and that it is held for no longer than is necessary for the purposes for which it is being processed. In addition, we will retain the minimum amount of information to fulfil our statutory obligations and the provision of goods and/or services, as required by the data protection legislation, including the UK General Data Protection Regulation (UK GDPR).

3. Retention

This retention policy (with its schedule) is a tool used to assist us in making decisions on whether a particular document should be retained or disposed of. In addition, it takes account of the context within which the personal data is being processed and our business practices.

We will regularly monitor and audit compliance with this policy and update it when required.

4. Disposal

We will ensure that personal data is securely disposed of when it is no longer needed. The method of disposal should be appropriate to the nature and sensitivity of the documents concerned and includes:

Type of record	Method of disposal
Non-confidential records	Place in waste paper bin for disposal.
Confidential records	Shred documents.
Deletion of computer records	Delete, and delete from the Recycle Bin (permanent deletion), and complete a backup sync to ensure data is not present on the hard drive backup.
Transmission of records to an external body, including an app	Contact the external body or app provider to request permanent deletion.

Type of record	Method of disposal
Cloud storage	Contact the cloud provider to formally request permanent deletion.

The schedule below contains the retention period that we have assigned to each type of record. This will be adhered to wherever possible, although it is recognised that there may be exceptional circumstances which require documents to be kept for either shorter or longer periods.

5. Requests to delete personal data

Anyone can ask us to delete their personal data (the right to erasure). Customers can do it themselves: under My account, then Your details, on the website; at the bottom of their coach hire or garage trade account; or under Account in the Home to School app. They can also ask any member of staff, by phone, email or in person. Staff with the right permission record it on the customer's page in the booking system, in the red Danger section, and note how and when it was asked for.

- The account closes straight away: the person can no longer sign in, and all marketing and messages stop.
- Their details are erased on the same date the following month (or the last day of a shorter month). That is the latest the law allows for acting on a request, and gives a short window to change their mind.
- Until then the office can reactivate the account, but only if the person asks us to.
- If they have a trip, hire, garage booking or Home to School travel still to come, or a pass still being paid for, it has to be cancelled or ended first. We tell them so.
- We keep only what the law requires: bookings, payments, refunds, invoices, credit notes and gift cards (6 years from the end of the financial year, for HMRC) and who travelled on each past trip (for claims, until 7 years after the trip). VAT invoices keep the name and address they were made out to.
- Everything else goes: contact details, address, emergency contact, health, dietary and passport details, dates of birth, notes, messages, chats, feedback, waiting lists, photos and the login.
- For Home to School, a child's details are erased with the parent's unless another parent or carer on file still looks after them.

If we can't delete something because the law requires us to keep it, we tell the person what we kept and why, within one month of the request. Complaints about how we handled a request are dealt with as in the Subject Access Request Policy (acknowledged within 30 days), and the person can also complain to the Information Commissioner's Office.

6. Automatic deletion and backups

The booking system applies this schedule itself every morning: it clears passengers' health, dietary, passport and date of birth details 3 months after a trip, removes travellers' names 7 years after a trip, deletes messages, chats and feedback after 2 years, stops marketing a year after the last contact, and closes for deletion anyone past their period (2 years for day trip customers, 12 months for Home to School families, 7 years for garage and coach hire customers). A person closed this way is treated exactly like a request: erased a month later unless the office reactivates them at their request.

Database backups are kept by our hosting provider for a short time and then overwritten. We never use them for anything except recovering from a failure. Every erased person is kept on a list (an internal reference number only, nothing personal), held both in the database and separately from it. If a backup is ever restored, the system erases everyone on that list again the next morning, so a restore can never bring a deleted person back.

Appendix 1: Document retention schedule

A1. HR and staff

Type of record	Retention period	Reason	Where it is stored and how it is deleted
----------------	------------------	--------	--

Data Retention Policy and Schedule

Type of record	Retention period	Reason	Where it is stored and how it is deleted
Employment records	6 years from the end of employment date	Legal	Stored: Locked cabinet Deletion: Shred paper documents. Permanent deletion from internal and external computer systems; cloud storage and associated employment apps.
PAYE records	6 years from end of fiscal year	Legal	Stored: Online computer software (secure/password protected) Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated employment apps.
Maternity and paternity pay records	3 years from end of fiscal year	Legal	Stored: Online computer software (secure/password protected) Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated employment apps.
Medical and health records relating to hazardous substances	40 years after employment ceases	Legal	Stored: Online computer software (secure/password protected); Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated employment apps. Shred paper documents
Medical and health records relating to sickness and personal injury	6 years after employment ends	Legal	Stored: Online computer software (secure/password protected); Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated employment apps. Shred paper documents
Unsuccessful candidates	6 months after last action	Legal	Stored: Online computer software (secure/password protected); Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated employment apps. Shred paper documents
Accident report forms (non-hazardous substances)	3 years after last action	Legal	Stored: Accident RIDDOR report book in locked cabinet Deletion: Shred paper documents from Accident RIDDOR report book. Permanent deletion from internal and external computer systems; cloud storage and associated employment apps. Deletion from HSE systems
Accident report forms (hazardous substances)	40 years after last action	Legal	Stored: Accident RIDDOR report book in locked cabinet Deletion: Shred paper documents from Accident RIDDOR report book. Permanent deletion from internal and external computer systems; cloud storage and associated employment apps. Deletion from HSE systems.

Data Retention Policy and Schedule

Type of record	Retention period	Reason	Where it is stored and how it is deleted
Parental leave records	5 years from birth of child	Legal	Stored: Online computer software (secure/password protected); Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated employment apps. Shred paper documents
Employment records: redundancy, equal opportunities; health & welfare records	6 years after last action	Legal	Stored: Online computer software (secure/password protected); Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated employment apps. Shred paper documents
Employees that left the business: emergency contacts and bank account details	Delete immediately after making final salary payment	Legal	Stored: Locked cabinet; Online payroll systems/online computer systems Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated employment apps. Shred paper documents
Pay & tax: pay deductions, tax forms, payroll, loans	6 years after last action	Legal	Stored: Online computer software (secure/password protected) Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated employment apps.
Records of formal disciplinary actions in employee file	6 years after last action	Legal	Stored: Online computer software (secure/password protected); Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated employment apps. Shred paper documents
Records of formal grievances in employee file	6 years after last action	Legal	Stored: Online computer software (secure/password protected); Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated employment apps. Shred paper documents

A2. Commercial contracts

Type of record	Retention period	Reason	Where it is stored and how it is deleted
Contracts with suppliers	6 years after last action	Supply contract breaches – legal	Stored: Locked cabinet; Scanned and saved onto computer hardware/cloud storage Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents
Contracts signed as a deed	12 years after last action	Deed breach – legal	Stored: Locked cabinet; Scanned and saved onto computer hardware/cloud storage Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware.

Data Retention Policy and Schedule

Type of record	Retention period	Reason	Where it is stored and how it is deleted
			Shred paper documents
Guarantees and indemnities	The term of the guarantee/indemnity plus 6 years for simple contracts or the term of the guarantee/indemnity plus 12 years for contracts signed as a deed.	Supply contract breaches – legal	Stored: Locked cabinet; Scanned and saved onto computer hardware/cloud storage Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents
Purchase orders and invoices	6 years after last action	Supply contract breaches – legal	Stored: Locked cabinet; Scanned and saved onto computer hardware/cloud storage Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents

A3. Tax and accounting records

Type of record	Retention period	Reason	Where it is stored and how it is deleted
Tax returns (limited company)	6 years from end of fiscal year	Legal and tax investigations. Audit and compliance. Legal	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents
Accounting & financial management information	A minimum of 6 years from end of fiscal year or for the period of time an asset was purchased to last over.	Audit and compliance. Legal	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents
Stock transfer forms and share certificates	20 years from purchase	Legal and tax requirement (best practice)	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents

A4. Marketing records

Type of record	Retention period	Reason	Where it is stored and how it is deleted
Mailing lists	1 year after last action (no action)	To assist with audit	Stored: Online encrypted/password secure database; Locked cabinet; Website Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents

A5. Operational records

Type of record	Retention period	Reason	Where it is stored and how it is deleted
Vehicles (financial)	Keep asset and depreciation records for 6 years after end of financial year to which they relate	Legal and tax investigations. Audit and compliance. Legal	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Closed circuit television recordings	30 days from the date recorded except where required as evidence after a written request before the 30 day deadline	Legal, criminal or insurance investigations	Stored: CCTV software storage system (encrypted/password protected) Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware.
Fire risk assessments	Retain until superseded (reviewed every 3 – 5 years as a minimum)	Legal	Stored: Computer hardware/cloud storage Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.

A6. Policies and procedures

Type of record	Retention period	Reason	Where it is stored and how it is deleted
Complaints	6 years from end of fiscal year	Legal, internal review and Ombudsman	Stored: Scanned and stored on computer hardware/cloud storage Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Building (for example, lease or deeds)	Destroy 6 years after property is no longer occupied	Legal and tax	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Maintenance contracts	6 years from last action or to cover the period the asset should last	Legal and tax	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Website FAQs	1 year from last action	Legal	Stored: Computer hardware/cloud storage; Email inbox; Website inbox system Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Property plans and surveys	25 years	Legal	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet Deletion: Permanent deletion from internal and

Data Retention Policy and Schedule

Type of record	Retention period	Reason	Where it is stored and how it is deleted
			external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Insurance schedules	6 years after last action or in the case of an insurance claim, 10 years after the claim is closed.	Legal	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
PAT tests, fire hazard tests	5 years from last action	Legal	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet; Fire test log book Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Register of members	Life of company	Legal	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Memorandum of association	Life of company	Legal	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet; HMRC software systems Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Register of directors and secretaries	Life of company	Legal	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet; HMRC software systems Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Employer's liability insurance certificates	Life of company	Legal	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Intellectual property records	Simple contract: 6 years after the contract expires Deeds: 12 years after the agreement expires Trademark: 6 years after registration	Legal	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.

Data Retention Policy and Schedule

Type of record	Retention period	Reason	Where it is stored and how it is deleted
	ceases Unregistered design rights: 10 years from the first sale or 15 years from creation (whichever is shorter)		
Copyright material	70 years from expiry	Legal	Stored: Scanned and saved onto computer hardware/cloud storage; Locked cabinet Deletion: Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.

A7. Email records

Type of record	Retention period	Reason	Where it is stored and how it is deleted
Email correspondence (enquiries and customer support)	Archive after 6 months and permanently delete after 2 years	Legal	Stored: Website email inbox; Email software providers; Locked cabinet Deletion: Archive: File into specific archive folder within the email or website inbox (password protected). Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Email correspondence (legal claim or contract)	Archive after 6 months and permanently delete 6 years after the last action (email)	Legal	Stored: Website email inbox; Email software providers; Locked cabinet Deletion: Archive: File into specific archive folder within the email or website inbox (password protected). Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents. Individuals have the right to request the deletion of the personal data. Requests should be honoured unless an overriding legal obligation or exception applies.

A8. Home to School Transport

Type of record	Retention period	Reason	Where it is stored and how it is deleted
Application, child data, parent data and email correspondence	Closed automatically 12 months after the family stops using the service (no travel, payment, application or app sign-in) and erased one month later. A child is only erased when no other	Legal	Stored: Locked cabinet; App software system; Scanned and saved onto computer hardware in encrypted/password protected database; Saved onto encrypted/password protected cloud storage; Email inbox software systems Deletion: Archive: Emails should be filed into specific archive folder within the email or website inbox (password protected) for the 12 months following the cessation of using the Home to School Service.

Data Retention Policy and Schedule

Type of record	Retention period	Reason	Where it is stored and how it is deleted
	parent or carer on file still looks after them. Payment records: 6 years from the end of the financial year		12 months thereafter, permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents. Individuals have the right to request the deletion of the personal data. Requests should be honoured unless an overriding legal obligation or exception applies.
Incident logs against a member of staff	Until the member of staff retires or 10 years from the date of the allegation (whichever is longer)	Legal	Stored: Locked cabinet; Scanned and saved onto computer hardware in encrypted/password protected database; Saved onto encrypted/password protected cloud storage; Email inbox software systems Deletion: Archive: File into specific archive folder within the email or website inbox (password protected). Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Incident logs – standard	1 year after the cessation of the Home to School Transport service	Legal	Stored: Locked cabinet; Scanned and saved onto computer hardware in encrypted/password protected database; Saved onto encrypted/password protected cloud storage; Email inbox software systems Deletion: Archive: File into specific archive folder within the email or website inbox (password protected). Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.
Incident logs – sexual abuse	Until the child's 75th birthday	Legal	Stored: Locked cabinet; Scanned and saved onto computer hardware in encrypted/password protected database; Saved onto encrypted/password protected cloud storage; Email inbox software systems Deletion: Archive: File into specific archive folder within the email or website inbox (password protected). Permanent deletion from internal and external computer systems; cloud storage and associated data storage hardware. Shred paper documents.

A9. Customers, bookings and website

Type of record	Retention period	Reason	Where it is stored and how it is deleted
Booking records: day trips, holidays, cruises, coach hire, private hire and trade bookings	6 years from the end of the financial year. Travellers' names and booking notes are removed automatically 7 years after the trip;	Legal (tax and accounting); claims	Stored: Booking system (secure, password protected database hosted in the UK) Deletion: Permanent deletion from the booking system; backups expire on their normal cycle

Data Retention Policy and Schedule

Type of record	Retention period	Reason	Where it is stored and how it is deleted
	the booking and its money stay as anonymous records		
Payment, refund, credit note, invoice and gift card records	6 years from the end of the financial year (gift cards: 6 years after the card is fully used)	Legal (tax and accounting)	Stored: Booking system (secure, password protected database hosted in the UK); accounting software Deletion: Permanent deletion from the booking system; backups expire on their normal cycle
Record of the terms and privacy policy a customer agreed to, and when	Kept with the booking (6 years from the end of the financial year)	Legal; evidence of the contract	Stored: Booking system (secure, password protected database hosted in the UK) Deletion: Permanent deletion from the booking system; backups expire on their normal cycle
Customer record and online account (contact details, loyalty stamps, credit)	2 years after the last booking, trip, message or sign-in: the account is closed automatically and its details erased one month later. Sooner on request (section 5). Bookings and payments stay as their own records (above)	Contract; legitimate interest	Stored: Booking system (secure, password protected database hosted in the UK) Deletion: Erased automatically by the nightly job, keeping the records the law requires; backups as section 6
Assistance, dietary and medical needs given for a day trip, holiday or cruise	Deleted 3 months after the trip, unless an incident or claim is open	Consent; safety of the traveller	Stored: Booking system (secure, password protected database hosted in the UK) Deletion: Permanent deletion from the booking system; backups expire on their normal cycle
Enquiry forms and live chat messages	Deleted automatically after 2 years. If a message is needed for a claim or contract dispute, the office saves a copy to the claim file first and keeps it 6 years after the last action	Legitimate interest; legal claims	Stored: Booking system (secure, password protected database hosted in the UK); Website email inbox Deletion: Permanent deletion from internal and external computer systems; cloud storage and email. Shred paper documents.
Trip feedback (star ratings and comments)	2 years: comments and replies deleted automatically (star ratings kept without them)	Legitimate interest	Stored: Booking system (secure, password protected database hosted in the UK) Deletion: Permanent deletion from the booking system; backups expire on their normal cycle
Marketing consent record and unsubscribe list	Mailing list entry: until the person unsubscribes, or 1 year after the last booking or contact, when marketing stops automatically.	Consent; legal (PECR)	Stored: Booking system (secure, password protected database hosted in the UK) Deletion: Permanent deletion from the booking system; backups expire on their normal cycle

Data Retention Policy and Schedule

Type of record	Retention period	Reason	Where it is stored and how it is deleted
	Marketing only ever goes to people who have opted in, so nothing is kept once the customer record itself is deleted (2 years after the last contact)		
Garage, MOT and recovery customer and job records	Invoices and payments: 6 years from the end of the financial year. Customer details closed automatically 7 years after the last job, visit or invoice and erased one month later	Legal; warranty and claims	Stored: Booking system (secure, password protected database hosted in the UK) Deletion: Permanent deletion from the booking system; backups expire on their normal cycle
Driver training and minibus training enquiries and course bookings	Enquiries: 2 years. Course bookings and certificates issued: 6 years from the end of the financial year	Legal; contract	Stored: Booking system (secure, password protected database hosted in the UK) Deletion: Permanent deletion from the booking system; backups expire on their normal cycle
Trade and hire accounts, statements and quotes	Invoices and payments: 6 years from the end of the financial year. Account and contact details closed automatically 7 years after the last hire, quote or invoice and erased one month later	Legal; contract	Stored: Booking system (secure, password protected database hosted in the UK) Deletion: Permanent deletion from the booking system; backups expire on their normal cycle
Website visit statistics (Vercel Analytics and Speed Insights)	Aggregated and not linked to a person; held by the provider under its own retention period	Legitimate interest	Stored: Vercel Deletion: Provider's own deletion cycle
Basket cookie	14 days, or until check out	Strictly necessary	Stored: The customer's browser Deletion: Expires automatically; the customer can delete it in their browser

A10. Home to School app and tracking

Type of record	Retention period	Reason	Where it is stored and how it is deleted
Travel card taps (time, run, coach, whether accepted)	13 months	Safety record; legitimate interest	Stored: App database (secure, UK) Deletion: Deleted by a nightly job
Coach position history on a run	14 days	Safety; showing the coach on the parent map	Stored: App database (secure, UK) Deletion: Deleted by a nightly job

Data Retention Policy and Schedule

Type of record	Retention period	Reason	Where it is stored and how it is deleted
Parent app accounts, payments and notification codes	Login and notification code removed when the parent deletes the account in the app; their details and their children's are erased one month later (section 5). Payment records: 6 years from the end of the financial year. Child record: 12 months after the child stops using the service (see Home to School Transport above)	Contract; legal (payment records)	Stored: App database (secure, UK) Deletion: Permanent deletion from the app system; cloud storage; email inbox

A11. Vehicle and driver records

Type of record	Retention period	Reason	Where it is stored and how it is deleted
PSV safety inspection records, repairs after inspection, brake test printouts and wheel torque records	15 months minimum (DVSA), kept on the vehicle file	Legal (operator licence undertaking)	Stored: Workshop system and vehicle file Deletion: Permanent deletion from computer systems once the period has passed
Driver walkaround checks and defect reports, with the repair that followed	15 months. Nil reports: at least 3 months (we keep 15 months)	Legal (DVSA)	Stored: Workshop system Deletion: Permanent deletion from computer systems
Tachograph data downloads and drivers' hours records	Tachograph data: 1 year. Working time records: 2 years	Legal (drivers' hours and working time rules)	Stored: Operations system and computer storage Deletion: Permanent deletion from computer systems
Phone positions sent while a driver is on a duty (staff app back-up tracking)	7 days	Safety; running the service	Stored: Operations system (secure, UK) Deletion: Deleted by a nightly job
Clock-in and clock-out locations, with the time record	6 years from the end of the financial year (kept with the pay record)	Legal (pay and working time)	Stored: HR system (secure, UK) Deletion: Permanent deletion from the HR system
Right to work checks	Employment plus 2 years	Legal	Stored: Locked cabinet; secure HR system Deletion: Shred paper; permanent deletion from the HR system
DBS check record for drivers and	For the length of employment plus 6	Legal; safeguarding	Stored: Locked cabinet; secure HR system Deletion: Shred paper; permanent deletion from the

Data Retention Policy and Schedule

Type of record	Retention period	Reason	Where it is stored and how it is deleted
escorts (date, level, outcome and reference)	years. A copy of the certificate itself is not kept for more than 6 months		HR system
Updated		Next review	
12 October 2026		12 October 2027	