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English Path Global Data Retention Policy

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Introduction

This Data Retention Policy outlines English Path’s commitment to managing personal data responsibly across all global locations. It defines how long different categories of data are retained and ensures compliance with international data protection laws. The policy supports transparency, accountability, and secure data disposal in line with our legal, regulatory, and accreditation obligations.

Translations available; please ask Student Services.

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1. Purpose

This policy establishes consistent, compliant data retention practices across all English Path campuses. It ensures personal data is held only as long as necessary, in line with legal, regulatory, and accreditation obligations (e.g., QCI, GDPR, ESOS, Languages Canada), supporting secure, transparent processing and institutional accountability across all jurisdictions of operation.

2. Scope

This policy applies to all English Path campuses, staff, systems, and third parties handling personal data. It covers all data types (student, staff, agent, host family, etc.), in both physical and digital formats, processed for academic, operational, or business purposes across all global locations, including Europe, the Middle East, North America, and Australia.

3. Definitions

Anonymisation: The process by which personal data is irreversibly altered so that an individual can no longer be identified directly or indirectly.

Data Protection Officer (DPO): A designated individual responsible for overseeing data protection strategy and compliance. The English Path DPO can be reached on compliance@englishpath.com

Data Subject: An identified or identifiable natural person to whom personal data relates.

Personal Data: Any information relating to an identified or identifiable person, including names, identification numbers, location data, and online identifiers.

Processing: Any operation performed on personal data, including collection, storage, use, disclosure, and deletion.

Retention Period: The length of time for which data must be stored before it is securely deleted or anonymised.

Third Country: Any country outside of the European Economic Area (EEA).

4. Responsibility

The following roles are responsible for implementing and monitoring this policy across all English Path locations:

- **Group Data Protection Officer (DPO):** Oversees policy compliance, advises on retention practices, and ensures alignment with applicable laws in all jurisdictions. The DPO also coordinates responses to data subject requests and manages data protection training.
- **Centre Managers:** Ensure local implementation of this policy, maintain site-specific retention registers, and liaise with the DPO on location-specific legal requirements and audits.



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- **Academic, Administrative, and IT Staff:** Maintain and dispose of records in line with the defined retention schedule, ensure data is processed securely, and report any issues related to non-compliance or data breaches.
- **Quality Assurance and Compliance Team:** Conduct internal audits and integrate data retention into the institutional Quality Assurance Framework in line with the relevant accreditation standards (British Council, QQI, ELICOS etc).

All staff are required to comply with this policy and attend mandatory training on data handling and retention procedures relevant to their roles.

5. Policy and Procedures

5.1 General Principles

English Path retains personal data only for as long as necessary for academic, legal, regulatory, or business purposes. Data processing complies with relevant legislation, including GDPR, PIPEDA, ESOS, UAE Federal Law No. 45/2021, and others. Retention decisions consider:

- Purpose of data collection
- Legal and contractual requirements
- Accreditation standards (e.g., QQI, British Council, ELICOS)
- Institutional risk and operational needs

Data no longer required is securely deleted or anonymised.

5.2 Retention Schedule Framework

The policy includes a structured retention schedule that classifies data into key categories:

- **Student Records** (Academic, Financial, Welfare)
- **Staff Records** (Employment, Payroll, Qualifications)
- **Marketing and Website Data**
- **Host Family, Agent, and Accommodation Data**
- **Safeguarding and Incident Reports**

Each entry includes a defined retention period, applicable legal/accreditation basis, and method of disposal. Location-specific retention laws (e.g., Irish Revenue, Canadian CRA, Maltese POMA, UAE MOE guidelines) are applied.



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5.3 International Compliance and Localisation

While global retention principles apply across all locations, local variations are applied where required by:

- National education and data protection laws
- Immigration or tax authority mandates
- Accreditation-specific expectations (e.g., ASQA Standard 8.1, ELT Council Clause 6b.iv, Languages Canada Section D)

The DPO maintains jurisdictional annexes to this policy to reflect evolving local laws and ensure ongoing legal alignment.

5.4 Data Disposal

At the end of a retention period, data is securely destroyed or anonymised. Acceptable methods include:

- Secure digital deletion using certified software
- Physical destruction of paper records (e.g., shredding)
- Erasure of storage media where applicable

6. References and related policies

Legislation and Regulatory Guidance

- EU General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)
- UK Data Protection Act 2018
- Ireland Data Protection Act 2018
- Maltese Data Protection Act (Chapter 586)
- France Loi Informatique et Libertés (amended 2018)
- Germany Bundesdatenschutzgesetz (BDSG)
- UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL)
- Saudi Arabia Personal Data Protection Law (PDPL, 2021)
- Canada Personal Information Protection and Electronic Documents Act (PIPEDA)
- Australia Privacy Act 1988
- Applicable national labour, tax, immigration, and education regulations per country of operation



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Related Policies can be found [here](#) .

- ICT Policy
- Privacy Policy
- GDPR Policy
- Safeguarding Policy

7. Forms

- Data Rights Request Form (Appendix J)

8. Policy review

This policy is reviewed annually or as needed in response to changes in internal procedures, best practice, accreditation guidelines, and/or legal requirements. Updates are approved by the Senior Management Team and communicated to staff and students.

Next review due: November 2026

Policy owner: Data Protection Officer

Contact: compliance@englishpath.com

9. Appendices

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- Appendix B: Data Retention Table Dublin
- Appendix C: Data Retention Table Paris
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Appendix A: Data Retention Table UK

| Category of Personal Data | Retention Period | Justification |
|--|--|---|
| Student Records (Academic) | 7 years after course completion | For reference, student requests, and legal defence. Based on Limitation Act 1980 (6 years) + 1 year. |
| Student Records (Financial) | 6 years | Required by HMRC for accounting and tax purposes (per Finance Act 1998, Sch 18, Para 21). |
| Student Passport/Visa Copies | 1 year after course completion (or as required) | UKVI recommends retaining copies for up to 12 months post-enrolment for inspection (Home Office). |
| Student Emergency Contact Details | 6 months after course completion | Only retained for post-course emergencies; no longer required beyond that. |
| Staff Employment Records | 6 years after termination of employment | Limitation Act 1980; potential for employment-related claims. |
| Staff Payroll Records | 6 years | Required for HMRC accounting / tax. |
| Host Family DBS Certificates or Vetting Info | Up to 6 months (record outcome only) | ICO guidance: do not retain full DBS; retain record of clearance status only (Rehabilitation of Offenders Act). |
| Host Family Contact Details | 2 years from last booking unless requested sooner | Necessary for managing future placements; data deleted on request. |
| Agent Contracts and Correspondence | 6 years after end of contract | Contract law (Limitation Act 1980). |
| Website User Data (Cookies/Logs) | As per cookie policy (session to 2 years) | ICO guidance on cookie retention in accordance with consent and purpose. |
| General Enquiries / Unsuccessful Applicants | 1 year | Retained for audit and statistical purposes; extended if consent for marketing is obtained. |
| Marketing Lists (With Consent) | Until consent withdrawn | ICO guidance: data must be deleted once consent is withdrawn; maintain consent record. |
| Accident/Incident Records | 3 years for adults; until the child reaches age 21 if a minor is involved. | (Health & Safety Executive (HSE) and Limitation Act 1980). |

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Appendix B: Data Retention Table Dublin

| Category of Personal Data | Retention Period | Justification |
|---|--|---|
| Student Records (Academic) | 7 years after course completion | Compliance with QQI requirements, academic history, and potential student queries. |
| Student Records (Financial) | 6 years (as required by the Revenue Commissioners of Ireland) | Legal obligations for financial records. |
| Student Passport/Visa Copies | 6 Months after course completion, only where legally required | Compliance with immigration laws if required, or deletion when no longer needed. |
| Student Emergency Contact Details | 6 months after course completion | To maintain contact in case of follow up required, or if a situation arises. |
| Staff Employment Records | 6 years after termination of employment | Legal obligations for employment records. |
| Staff Payroll Records | 6 years (as required by the Revenue Commissioners of Ireland) | Legal obligations for financial records. |
| Host Family Garda Vetting/Police Clearance | 3 years (or as legally required) | Compliance with Child Protection legislation, renewals may mean retention beyond this period. |
| Host Family Contact Information & Details | 2 Years from last booking, unless they have asked for deletion | To maintain a relationship with host families, if they do not wish to be contacted, this is reduced to zero. |
| Agent Contracts and Correspondence | 6 years after termination of contract | Legal and contractual obligations. |
| Website User Data (Cookies/Logs) | As per cookie policy (Typically ranging from session cookies to 2 years for marketing cookies) | As required by the school's cookie policy and website functionality. |
| General Enquiries (Unsuccessful Applications) | 1 Year | For statistical and business purposes. If consent is given for further communications this period can be extended with correct record of consent. |
| Marketing Lists (With Consent) | Until consent withdrawn | Only data kept while consent is given, proof of consent must be maintained |
| Accident/Incident Records | 10 years | Legal Obligation in case of lawsuits, or claims. |

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Appendix C: Data Retention Table Paris

| Category of Personal Data | Retention Period | Justification |
|---|---|---|
| Student Records (Academic) | 5 years after course completion | Ensures availability for transcript requests and audits (CNIL). |
| Student Records (Financial) | 10 years | Article L102 B Code Général des Impôts for accounting documents. |
| Student Passport/Visa Copies | 1 year after end of stay | Immigration control compliance; CNIL recommendation. |
| Student Emergency Contact Details | 6 months after course completion | Emergency follow up only; CNIL minimization principle. |
| Staff Employment Records | 3 years for employment contracts and related documentation. 5 years for payslips. 10 years for payroll/accounting records | Article L3243-4 Code du Travail Article L3243-4 Code du Travail Code du Commerce. |
| Staff Payroll Records | 5 years (general payroll), 10 years for accounting | CNIL & Code du Commerce Art. L123-22 for accounting records. |
| Host Family Police Check / Vetting Info | 6 months (keep clearance result only) | CNIL guidance limits sensitive data retention. |
| Host Family Contact Details | 3 years from last contact | Permitted duration for business contacts (CNIL). |
| Agent Contracts and Correspondence | 5 years after termination | Standard contract limitation period (Code Civil Art. 2224). |
| Website User Data (Cookies/Logs) | 13 months for cookies; 6 months for logs | CNIL cookie & log retention recommendations. |
| General Enquiries / Unsuccessful Applicants | 2 years | CNIL recruitment guidance for CV retention. |
| Marketing Lists (With Consent) | Until consent withdrawn | GDPR consent requirements (Art. 6). |
| Accident/Incident Records | 5 years (adults); 10 years if minor involved | Civil liability claims period (Code Civil Art. 2226). |

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Appendix D: Data Retention Table Berlin

| Category of Personal Data | Retention Period | Justification |
|---|---|--|
| Student Records (Academic) | 10 years after course completion | Common practice in higher education for audit, accreditation, and student requests (3 years per BGB §195). |
| Student Records (Financial) | 10 years | Required by §147 AO and §257 HGB for accounting records. |
| Student Passport/Visa Copies | 6 months after end of stay (or as legally required) | Based on storage limitation principle (Art. 5 GDPR) and BfDI advice. |
| Student Emergency Contact Details | 6 months after course completion | No longer necessary after final contact; deletion ensures minimisation (Art. 5 GDPR). |
| Staff Employment Records | 10 years after termination | Civil claims under BGB §195 (3 years general + employment-related extensions). |
| Staff Payroll Records | 10 years | Per §147 AO and §257 HGB for payroll and accounting records. |
| Host Family Police Check / Vetting Info | 6 months (retain only decision/outcome) | BfDI and data minimisation principle require avoiding long-term retention of criminal data. |
| Host Family Contact Details | 3 years from last contact | Legitimate interest in managing future placements (BfDI guidance). |
| Agent Contracts and Correspondence | 6 years after termination | §257 HGB requires 6-year retention for commercial correspondence. |
| Website User Data (Cookies/Logs) | Periods must be disclosed and minimised. | Per BfDI and DSK cookie recommendations. |
| General Enquiries / Unsuccessful Applicants | 6 months (or 2 years with consent) | BDSG §26(1) for recruitment; consent-based extension if applicable. |
| Marketing Lists (With Consent) | Until consent withdrawn | Based on Art. 6(1)(a) GDPR and BfDI: retain only with valid, verifiable consent. |
| Accident/Incident Records | 10 years | Liability and insurance claim periods (3 yrs required under BGB and occupational safety laws.) |

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Appendix E: Data Retention Table Malta

| Category of Personal Data | Retention Period | Justification |
|---|--|--|
| Student Records (Academic) | 10 years after course completion | For accreditation, auditing and future student queries. Based on common HE practice and MFHEA guidance. |
| Student Records (Financial) | 9 years | As required under the Income Tax Management Act (CAP 372) for financial record-keeping. |
| Student Passport/Visa Copies | 6 months after course completion (or as required) | Immigration regulations under Identity Malta guidelines; delete when no longer necessary. |
| Student Emergency Contact Details | 6 months after course completion | Used for urgent post-course contact; not retained beyond necessity. |
| Staff Employment Records | 10 years after termination of employment | As per Employment and Industrial Relations Act, (CAP 452) and to cover potential claims. |
| Staff Payroll Records | 9 years | Required by Maltese tax law for payroll-related documentation (CAP 372). |
| Host Family Vetting/Police Certificates | 5 years max (or as legally required). | Aligned with child safeguarding practices and re-vetting cycles. |
| Host Family Contact Details | 2 years from last booking, unless requested sooner | Retained to support future placements; deleted on request. |
| Agent Contracts and Correspondence | 10 years after termination | Based on general contract limitation periods of 9 yrs, and extra year buffer for audit traceability (Limitation of Actions, CAP 16). |
| Website User Data (Cookies/Logs) | As per cookie policy (typically up to 2 years) | In accordance with IDPC cookie and tracking guidance. |
| General Enquiries / Unsuccessful Applicants | 1 year | Retained for statistical or audit purposes; longer with consent. |
| Marketing Lists (With Consent) | Until consent withdrawn | As per GDPR and IDPC guidance; requires active consent and opt-out capability. |
| Accident/Incident Records | 10 years; 25 years if a minor is involved | Based on limitation for civil liability and Health & Safety legal obligations. |

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Appendix F: Data Retention Table Dubai

| Category of Personal Data | Retention Period | Justification |
|---|--|--|
| Student Records (Academic) | 7 years after course completion | Common practice in education institutions; aligns with civil claim limitation periods. |
| Student Records (Financial) | 7 years | Required by the UAE Federal Tax Authority (FTA) for VAT compliance and financial auditing. |
| Student Passport/Visa Copies | Delete as soon as no longer needed. Max 3 years after course completion. | UAE labour and immigration practices suggest keeping visa/passport copies for up to 3 years post expiry. |
| Student Emergency Contact Details | 6 months after course completion | Retained only as necessary for emergencies; deleted when no longer needed. |
| Staff Employment Records | At least 2 years after termination, 7 years for tax/finance supporting docs. | UAE Labour Law (Federal Decree-Law No. 33 of 2021) requires 2-year retention for employment records. |
| Staff Payroll Records | 5 years | FTA requires 5-year retention of payroll and salary information for audit and compliance. |
| Host Family Police Clearance | 1 year (or as required) | Local practice; no formal mandate, but sensitive data should be retained minimally under PDPL. |
| Host Family Contact Details | 2 years from last contact | Business contact data can be retained for legitimate interest unless deletion is requested. |
| Agent Contracts and Correspondence | 10 years after termination | Standard limitation for contract claims in UAE Civil Code (Federal Law No. 5 of 1985). |
| Website User Data (Cookies/Logs) | As per cookie policy (typically up to 2 years) | PDPL encourages transparency and consent-based processing, similar to GDPR. |
| General Enquiries / Unsuccessful Applicants | 1 year | Kept for reference or statistical purposes; extendable with consent under PDPL. |
| Marketing Lists (With Consent) | Until consent withdrawn | Under PDPL, consent must be freely given and can be withdrawn at any time. |
| Accident/Incident Records | 5 years | Aligns with potential civil liability periods and workplace safety practices. |

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Appendix G: Data Retention Table Riyadh

| Category of Personal Data | Retention Period | Justification |
|---|---|--|
| Student Records (Academic) | 10 years after course completion | Common practice and aligns with Ministry of Education archiving requirements. |
| Student Records (Financial) | At least 6 years. 10 years where sectoral rules apply | Per General Authority of Zakat and Tax (GAZT) and financial audit standards. |
| Student Passport/Visa Copies | Delete when no longer required. Max 3 years after course completion | To comply with Saudi immigration and residency system practices (Absher/Muqem). |
| Student Emergency Contact Details | 6 months after course completion | Necessary for post-course contact; should not be retained unnecessarily. |
| Staff Employment Records | Min 6 years after termination | Saudi Labor Law requires documentation retention for 6 years after termination. |
| Staff Payroll Records | 6 years | Required by ZATCA regulations for tax and payroll auditing. |
| Host Family Police Clearance | 1 year (or as required) | No formal mandate; best practice is minimal retention aligned with data minimization under PDPL. |
| Host Family Contact Details | 2 years from last contact | Retained for operational reasons; data deleted if requested. |
| Agent Contracts and Correspondence | 6 years after termination | Sharia and civil law require retention for dispute resolution and auditing. |
| Website User Data (Cookies/Logs) | As per cookie policy (typically up to 2 years) | Aligned with National Cybersecurity Authority guidance on data retention. |
| General Enquiries / Unsuccessful Applicants | 1 year | Held for internal reporting; extension only if consent is granted. |
| Marketing Lists (With Consent) | Until consent withdrawn | Saudi Personal Data Protection Law (PDPL) requires consent and allows withdrawal. |
| Accident/Incident Records | 10 years | For potential litigation or regulatory inspection under Saudi labour and liability laws. |

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Appendix H: Data Retention Table Toronto

| Category of Personal Data | Retention Period | Justification |
|---|--|---|
| Student Records (Academic) | 7 years after course completion | Common practice in Canadian post-secondary institutions; allows for transcript requests and audits. |
| Student Records (Financial) | 6 years from end of tax year | Required by CRA for all records supporting income tax filings (Income Tax Act). |
| Student Passport/Visa Copies | Delete when no longer required. | Retain only as needed for compliance with IRCC and delete promptly per PIPEDA principles. |
| Student Emergency Contact Details | 6 months after course completion | Retain only as long as necessary for emergency purposes; follows PIPEDA's storage limitation principle. |
| Staff Employment Records | 3 years after termination (federal); 6 years recommended (CRA) | Canada Labour Code requires 3 years; CRA recommends 6 years for payroll. |
| Staff Payroll Records | 6 years | CRA requirement for payroll, T4 slips, and tax documentation. |
| Host Family Background Checks / References | 1 year (or as needed) | No fixed federal rule; retain only suitability outcome; delete original sensitive data per OPC. |
| Host Family Contact Details | 2 years from last booking unless requested sooner | Retain for future bookings, with individual's right to withdraw consent under PIPEDA. |
| Agent Contracts and Correspondence | 6 years after termination | Based on standard CRA and contract law recordkeeping for business agreements. |
| Website User Data (Cookies/Logs) | As per cookie policy; max 2 years with consent | Must align with express or implied consent under OPC's guidelines. |
| General Enquiries / Unsuccessful Applicants | 1 year (extendable with consent) | Best practice under OPC: retain only as long as needed, with explicit consent to retain longer. |
| Marketing Lists (With Consent) | Until consent withdrawn | PIPEDA mandates consent-based use of personal data for marketing purposes. |
| Accident/Incident Records | 6 years (or longer if litigation is possible) | CRA and legal liability considerations for insurance or workplace safety claims. |

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Appendix I: Data Retention Table Brisbane

| Category of Personal Data | Retention Period | Justification |
|---|---|--|
| Student Records (Academic) | 7 years after course completion | TEQSA and CRICOS institutions typically require retention for accreditation and verification purposes. |
| Student Records (Financial) | 5 years | Required under the ATO for accounting and tax-related documents (per Income Tax Assessment Act 1997). |
| Student Passport/Visa Copies | Min 2 years after enrolment ends | CRICOS (Standard 3.6) requires keeping these for at least 2 years post-enrolment. |
| Student Emergency Contact Details | 6 months after course completion | Retained only while necessary for health/safety purposes; Privacy Act 1988 requires data minimisation. |
| Staff Employment Records | 7 years after termination | Required under Fair Work Act 2009 (s.535) for employee records. |
| Staff Payroll Records | 7 years | Mandated by ATO and Fair Work for payroll/taxation compliance. |
| Host Family Working with Children/Vetting | 1 year (retain suitability status only) | WWCC info should not be retained longer than necessary (per OAIC). |
| Host Family Contact Details | 2 years from last booking unless requested sooner | Business necessity under Privacy Act principles; consent may be withdrawn. |
| Agent Contracts and Correspondence | 5 years after termination | Standard commercial recordkeeping under Australian Consumer Law. |
| Website User Data (Cookies/Logs) | As per cookie policy (typically 1–2 years) | Must be consistent with the Privacy Act and OAIC's guidance on tracking technologies. |
| General Enquiries / Unsuccessful Applicants | 12 months (up to 2 years with consent) | OAIC advises retention only if necessary; extension requires informed consent. |
| Marketing Lists (With Consent) | Until consent withdrawn | Privacy Act requires clear and active consent for direct marketing communications. |
| Accident/Incident Records | 7 years (adults); up to age 25 if child involved | WHS regulations and state liability timeframes. |



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Appendix J: Data Rights Request Form

Data Rights Request Form

Use this form to request:

- A copy of your personal data
- A correction to incorrect data
- Deletion of your data
- A restriction on processing
- Data transfer to another provider
- Objection to data use

Your name: _____

Student/staff ID (if known): _____

Email address: _____

Type of request: ☐ Access ☐ Rectification ☐ Erasure ☐ Restriction ☐ Objection ☐ Portability

Details of your request: _____

Please return this form to compliance@englishpath.com or Reception. We will respond within **30 days**. We may need to verify your identity.