

Data Retention Schedule

About this schedule

This schedule explains how long we keep personal data and the reasons for each period. Retention may be extended where needed to meet legal or regulatory obligations, to resolve disputes, or to enforce agreements.

Controller

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Learner identity verification (Ofqual-regulated provision)

- Verification outcome and minimal audit (status, session ID, timestamp, verified outputs such as name, DOB, document type/issuing country, truncated document number): retained for the duration of study and up to six (6) years after the last certification outcome.
- Manual uploads (ID document images and live selfie): kept only until a manual decision is recorded and for no longer than 90 days; then securely deleted.
- Webhook and system logs for IDV: typically up to 12 months.

Course and assessment records

- Enrolment, progression, assessment submissions, feedback, grading and award data: typically up to six (6) years after completion or last activity, unless a longer period is required for quality assurance or regulatory reasons.
- Remote invigilation artefacts (where used): retained only as long as necessary to conclude any quality or malpractice reviews, typically up to 12 months unless part of an active investigation.

Accounts and payments

Billing, invoicing and payment records (including tax records): six (6) years from the end of the financial year to which they relate.

Support and operations

- Helpdesk tickets and email correspondence: up to two (2) years after resolution, unless required longer for ongoing matters.
- System and security logs (including access logs): up to twelve (12) months.
- Backups: rolling cycles, typically 30–90 days.

Marketing and communications

- Marketing preferences and mailing lists: until you withdraw consent or for up to twenty-four (24) months after your last meaningful interaction, whichever comes first.
- Suppression lists (opt-out records): kept indefinitely to honour your choice not to receive marketing.

Job applicants, contractors and staff (where applicable)

- Applicant CVs and selection notes: up to six (6) months after the vacancy closes, unless you consent to a longer talent-pool retention (up to twelve (12) months).
- Right-to-work and onboarding records (staff/contractors): as required by law (typically up to six (6) years after engagement ends).
- Payroll and HR records: as required by law (commonly six (6) years).

Deletion and disposal

When retention periods end, we delete or anonymise data securely. For files stored in restricted folders (e.g., manual ID verification uploads), we use controlled access and scheduled deletion. Where full erasure is not possible (e.g., system backups), the data will be isolated from active use until the backup cycle completes.

Your rights

You can request deletion or access under UK GDPR. Some records must be retained despite a deletion request where lawful obligations apply (e.g., tax, quality assurance, or regulatory requirements). See our [Privacy Policy](#) for details.

Reviews and updates

We review this schedule annually and update it when processes or requirements change.

This policy has been approved & authorised by:

James Ruswel
Quality Assurance
25 August 2025

