

## **Record keeping and retention Policy**

### **PURPOSE**

The purpose of this document aims to ensure the learner that all their personnel information is retained in line with UK GDPR. Centre Assessment Standards Scrutiny (CASS) and Data Protection Act 2018 (in-line with WSS commitment to ICO requirements and guidance).

### **What is the minimum that should be kept?**

As a minimum WSS will keep a learner file for each learner. It will contain:

- evidence about the learner, e.g. proof of identify
- evidence of eligibility
- evidence of qualifications/course studied and achieved

### **How should files be stored?**

Learner files will be stored electronically. Electronic data records and documents should be stored in secure off-site cloud-based servers that meet accepted security standards and legal requirements so can be relied upon for audit purposes.

However, if records are kept in paper-format they will be stored in individual folders, one folder per learner per academic year. All paper records will be stored in secure, lockable, fireproof, non-portable storage containers and access should be strictly controlled and limited to staff that need to access the records. During transportation learner files are to be kept secure in a vehicle and removed overnight to be then kept in a lockable cabinet.

Learner files will be stored in electronic systems or paper folders that contains the following information:

- learner's surname, first name
- course studied
- academic year
- destruction date (7 years from date study ended or as per Awarding Body guidance)

### **Retention of records**

Learner files, course paperwork (Assessment decisions, ILP, Inductions, Reviews) should be retained securely for 3 years from achievement or as determined by Awarding Bodies guidance. This retention period is also relevant to investigations involving a potential criminal prosecution or civil claim, after the case and any appeal must be heard.

### **Disposal of Records**

Once records have reached the end of their designated retention period, they will be disposed of securely and confidentially in accordance with data protection legislation and internal policies.

Any records containing personal data or sensitive information will be destroyed in a manner that ensures they are unreadable and cannot be reconstructed. The following methods will be used:

- Paper records will be shredded using a cross-cut shredder or by a certified external shredding company.
- CDs, DVDs, and floppy disks will be physically cut into pieces to ensure data cannot be recovered.
- Audio/video tapes and fax rolls will be dismantled and shredded.
- Hard drives will be dismantled and physically damaged (e.g. sanded or drilled) to render the data irretrievable.
- Electronic copies of ID used for course or qualification registration will be deleted immediately once the registration process and ID verification are complete.
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Workforce Skills Support (WSS) will never dispose of records containing personal or sensitive data via regular waste or skips.

Where an external contractor is engaged for shredding services, WSS will ensure:

- All shredding takes place on-site and is witnessed by a WSS employee.
- A Certificate of Destruction is obtained and retained as proof of secure disposal.

### **Record retention of CITB/ATO Course Documentation**

1. We must have and maintain a reliable, auditable system of all training or testing delivered, as well as quality assurance documentation, for a minimum period of three years.
2. Our senior quality consultant will review your documents during their interventions and advise you of the fitness for purpose of your document retention systems.
3. This information could be used to substantiate any claims and/or resolve any appeals during the three-year period. The records will form part of the quality assurance checks and be used to audit course delivery. This shall include:
  - course notifications
  - Initial assessment documentation
  - delegate information forms
  - course results form
  - examination papers and any resits
  - course evaluation
  - course attendance records and documented evidence of delegate ID checks
  - quality assurance documentation.

### Annex A

Retention of Assessment material will be considered in line with Awarding Body requirements, as defined in their policies and guidance. All learners will be given the option to retain their completed portfolio of evidence and copies retained electronic by the centre under the period as defined within this policy.