

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
- ESF contract number (if applicable)
- destruction date (6 years from date study ended, or 31/12/2030 if ESF-funded, or as per Awarding Body guidance)

ESF records must be easily identifiable and it is recommended that they are kept separately.

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

When records have reached their retention period, data will be disposed of securely and confidentially.

All records containing personal information, or sensitive policy information will be made either unreadable or unreconstructedly:

- paper records will be shredded using a cross-cutting shredder or shredded by an external company.
- CDs / DVDs / floppy disks should be cut into pieces
- audio / video tapes and fax rolls should be dismantled and shredded
- hard disks should be dismantled and sanded

WSS will not put records in with the regular waste or a skip.

Where an external contractor is used for shredding records, WSS will ensure that all records are shredded on-site in the presence of a WSS employee. WSS will retain proof to prove that the records have been destroyed by the company through a Certificate of Destruction.

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.