



Document Retention Policy

Reviewed by Adam Davies, Quality Manager

Approved by Lynne Whitehouse, Operations Director

Version date: 2/9/21

Review schedule: 2/9/22 or in line with operating procedure and/or legislative updates/requirements

Person/s responsible: SLT, all management and staff

Signed *Adam Davies*

Signed 
Policy owner

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Overview

As a training provider accessing government funding for learning programmes via local authorities and the National Skill Fund, Netcom Training will adhere to the appropriate document retention requirements and also meet those of the Data Protection Act 2018 in relation to data sharing and protection. The business is registered with the Information Commissioners Office(ICO) and will meets its obligations in accordance.

Learner records will be transferred if required by the relevant funding authority at the termination of contracts. All other records will be destroyed if they have reached the retention period or retained until such a time has lapsed.

The company Data Protection policy should be referred to in conjunction with the content of this policy.

Record keeping requirements

Files will be kept for each learner and will contain as a minimum requirement for funding purposes:

- evidence about the learner, e.g. proof of identify
- evidence of eligibility for funding
- evidence of qualifications/course studied and achieved
- any additional information required by funding agencies/rules

File storage

Learner files are stored electronically in secure off-site cloud-based servers that meet accepted security standards and legal requirements. They will contain the following information:

- learner's surname, first name
- course studied
- academic year
- documentation required for funding or awarding body purposes

Retention of records

Learner files are required to be retained securely for 6 years from Financial Year End after the relevant course completion. The company will observe any additional requirements that may be placed upon it by funding bodies/awarding bodies and the ICO. Guidance will be sought with these bodies prior to the destruction of documentation after this time has lapsed. In addition, electronic portfolios will be kept for a minimum period of 2 years after which time they will be destroyed. Any certificates held and not claimed by learners will be returned to the relevant awarding

body. Corporate records such as HR, Finance and Contracts will be retained as per guidance from HMRC and Companies House.

Disposal of records

When records have passed their retention period, data will be disposed of securely and confidentially. All records containing personal, confidential or sensitive information will be made either unreadable or unreconstructible:

- removable media cut into pieces
- disk storage wiped and made available for collection in line with WEEE Regulations, along with any other computer components or accessories containing data for recycling purposes or safe disposal

Under no circumstances should records be disposed of with regular waste disposal

Monitoring and review

The policy and procedures will be reviewed at least annually or in the light of significant changes to processes or legal requirements or as a result of any policy breaches. Any such changes will be communicated at the earliest opportunity to all relevant staff and other parties that may be affected.