



Document Retention Policy

Introduction

It is the responsibility of Integer to hold evidence of the right and proper use of public funding. This must be done in accordance with the requirements of UK GDPR and the Data Protection Act 2018.

What is the minimum that will be kept?

As a minimum each learner file will contain:

- Details of the learner's identity, and that appropriate ID documents were seen by an authorised member of staff
- Evidence of eligibility for funding
- Evidence of qualification/course being studied, and achieved
- Details of funding applied

Storage

Learner files will be stored electronically, in secure off-site cloud-based servers that meet the acceptable security standard for Cyber Essential Plus certification (renewed annually).

Learner files may also be retained in paper format. Where this is the case, each file is retained individually in a clear plastic wallet, clearly marked with the following information:

- Learner name (surname, forename)
- Qualification/course title
- Academic year, with start and end date
- Funding contract

Learner paper files will be retained in a secure, lockable, fireproof, non-portable storage cabinet. Access to both electronic and paper files will be strictly controlled and limited to only those staff who need to access the records.

Retention

Learner files will be securely retained for a period of 6 years from the academic year end after the end of the course, or until 31/12/2030 if ESF-funded provision.

Record checklist

Type of record	Retention period	Action
Learner records: • Details of learner • Course studied • Learner eligibility • Funding applied	6 years from academic year end after the learner has left Integer	Records older than 7 years are securely destroyed. A list of all remaining records will be maintained with full name, qualification/course studied, start and end dates, funding applied
'Learner' portfolios (paper and electronic)*	3 years from the end of course	Records older than 3 years will be securely destroyed
Certificates	Sent to learners within 10 working day of receipt in office	Returned/non-delivered certificates retained on learner file
European Social Fund (ESF)	For the 2014-20 ESF Programme until at least	Retained records past the destruction date will be securely destroyed.

	until 31 December 2030	NB: need to check the DWP-ESF guidance on the www.gov.uk site prior to destroying any paperwork in case the destruction date has changed.
Corporate records • HR records including training records and notes of disciplinary and grievance hearings.	6 years from the end of employment	Records older than 7 years are securely destroyed.
Finance records	6 years from the end of employment	Records older than 7 years are securely destroyed.

Data Transfer

If the learner moves to a new provider or if a contract is terminated, Integer will:

- retain the learner file as per retention periods set out in the table above. The new provider will be responsible for gathering new evidence for the learner.
- transfer the learner's portfolio so they can continue their course with the new provider.

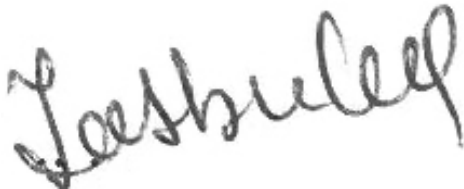
If the learner file needs to be transferred back to ESFA, the ESFA record transfer agreement will be used.

Paper learner files will be boxed up keeping ESF records in separate boxes and retained securely for the retention periods set out in the table above.

Disposal

Once the retention period has elapsed, Integer will securely destroy learner files and documentation. A licensed external organisation, such as Britannia Lanes, will be used for this purpose. Sacks will be filled and tagged at each year-end purge and no partly filled sacks will be left open.

Declaration I will review and revise this policy as necessary and at regular intervals:



Signature of Jasbir Behal, Managing Director, Integer Training Ltd

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