RECORDS MANAGEMENT AND RETENTION POLICY

Policy Statement:

Train'd Up recognises that the efficient management and retention of its records is necessary, to support its core functions, to comply with its legal, regulatory and contractual obligations and to contribute to the effective overall quality management of the company.

Records management is defined as a field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including process for capturing and maintaining evidence of and information about business activities and transactions in the form of records.

Purpose:

The purpose of the Policy is to establish an efficient company-wide record management system for maintaining, identifying, retrieving, preserving and destroying records ensure that records are adequately protected ensure that records that are no longer needed or of no value are destroyed at the appropriate time ensure the company complies with all applicable laws, regulations, contractual and awarding body requirements.

Scope (all employees):

This policy applies to all records, regardless of format, whether in paper, electronic, microform (e.g., microfilm, microfiche, magnetic tapes, and CD-ROM), or other medium.

Roles and Responsibilities:

- The Head of Quality & Compliance is responsible for managing the archiving of all paper records
- The Managing Director is responsible for managing the management and retention of quality and funding records (including ESFA or any other funding bodies)
- The Head of Finance is responsible for managing financial/payroll records
- The Managing Director is responsible for managing non finance electronic records
- Employees are responsible for managing electronic documents on their laptops and for only using resources and records from the 'Document Master Log' to ensure only current paperwork and resources are used
- Assessors, Tutors and Learners are responsible for Learner Portfolios (paper-based or e-system).

Policy Implementation – Procedures:

The records retention schedule documents the minimum length of time the company's records should be retained to comply with legal, regulatory contractual and operational requirements. Retention periods and which documents are retained are formulated based upon a number of factors:-

- **The Data Protection Act 2018** – which regulates how the company uses and stores personal information, protects individuals against misuse of information and provides them with the right to access. It is also used to ensure that information is not held for longer than necessary
- **The Limitation Act 1980** – sets out time limits which enable former learners (after leaving the centre) in which they are entitled to take civil action against the company and for which the company may use the files as evidence
- **Professional, Statutory, Funding and Regulatory bodies** – Programme and courses accredited by professional, statutory or regulatory bodies, such as EAL, City & Guilds, ESFA etc.
- **Cost** – The cost of storage and maintenance of records (paper and electronic)
- **Freedom of Information Act 2000** – Through partnership working with sub-contracted colleges or employers the Freedom of Information Act provides a general right of access to our records.

The retention schedule is also used to ensure that the company balances the requirement to not hold on to records unnecessarily with the need to prevent the premature disposal of information we are legally and/or contractually required to keep. Retention periods outlined in the schedule are applied to records in whatever medium they are held (paper, electronic etc.).

Using the Schedule:

The schedule categorises the company's records and describes:

- The Record Type
- The Record Function
- Minimum Retention Period
- Examples of records

Retention periods are independent of format and therefore can be applied to any medium whether paper or electronic. Retention periods are defined as the 'minimum', which mean that files may be retained for a longer period should they be required but must not be disposed of before the identified time.

Storage of Paper Records - These records need to be stored, safely in a secure archive facility.

Disposal of Records - At the end of the designated retention periods, appropriate action should be taken against the records as outlined in the retention schedule. These will be:-

- **Destroyed** – The record can be destroyed using the appropriate method. This may be 'deleted' for electronic records or disposed of for recycling in the case of non-confidential paper records. All confidential records, including those containing personal or financial information should be disposed of using confidential waste disposal (shredded). A record should be kept of the destruction.
- **Review** – Documents marked for review at the end of their retention period may be required for a longer period. Therefore, their status should be checked before any action is taken.

See also: Data Protection Policy (GDPR)

Director Policy Approval:
This Policy is reviewed as a minimum on an annual basis and is approved and endorsed by the Board of Directors and Senior Management Team.

Signed on behalf of Company Directors:

Laura Thompson

Name: Laura Thompson
Position: Finance Director
Date: 13/10/2025

END.

Train'dUp
Respecting People – Developing Business