



European Union
European
Social Fund



Education & Skills
Funding Agency



Document Retention Policy



1. Introduction

Skills People Group consists of the following companies.

- *Construction Skills People*
- *C&G Assessments and Training Ltd*
- *Training Futures UK Ltd.*

The company is required to collect and retain information about employees, learners and third parties to comply with:

- Funding rules
- Awarding Organisation requirements
- Government organisations
- HM Revenues and Customs
- Accounts and Internal Audit
- Recruitment

2. Why the company retain Data:

At the heart GDPR, is the principle that the company should only collect **and retain data as long as we need it**. Article 5 of the act, states that data must be 'collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes'. as such, the following principles apply to data retention.

3. Policy

This policy stipulates the reasons why we retain data:

a. Funded Learning

Where provision has been funded using funds from the Adult Education Budget (AEB) or funded using European Social Fund (ESF) monies which come direct from the European Union (EU) which are both managed by the Education and Skills Funding Agency (ESFA) This company is required under the European Social Fund (ESF): 2014-2020 to retain documents for the following reasons and retention periods:

The EC or other programme authorities will audit evidence relating to the ESF contract to support the payments made. Additionally, the European Court of Auditors may audit up to 2030. All supporting documentation evidencing the delivery of the ESF project must be kept for a period of three years from 31 December following the submission of the accounts in which the expenditure of the programme is included.

The retention of Documents date is currently 31 December 2030 however, the company will be notified of any change to this date.

b. Awarding Organisation

The companies' retention periods are set to comply with awarding organisation requirements and government guidance.

Specific retention periods are stipulated by the relevant awarding organisation to meet their requirements.

Retention periods include:

- Learner assessment evidence and records including registration and certification
- Appeals
- Malpractice investigations

After this period the documentation will be securely destroyed.

c. HM Revenues and Customs

The company adhere to the default standard retention period for HMRC records which is 6 years plus current, otherwise known as 6 years + 1. This is defined as 6 years after the last entry in a record followed by first review or destruction to be carried out in the additional (=1) accounting year.

d. Accounts Internal Audit

To ensure the company audit requirements are met, financial information associated with the audit of its year end final accounts are retained for 7 years.

e. Human Resources

The company retains personal information to fulfil the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data the company consider: the nature, and sensitivity and potential risk of harm from unauthorised use or disclosure.

In some circumstances, the company may anonymise information so that is no longer "in a form which permits identification of data subjects". The company may retain anonymised information for research or statistical purposes in compliance with Data Protection Act 2018.

4. Document disposal

Documents are securely disposed of annually where applicable.

5. Review of retention periods

The company review their retention periods on an annual basis unless, there is a potential for a significant impact on individuals. The company also review personal data if any individual requests this under their 'right to erasure of personal data' that is no longer needed for specified purposes.

6. Compliance

Compliance of the policy is periodically checked by an internal company auditor.

Document Control

Date of change	Version	Overview of amendment	Amended by / Job title	Approved by	Approval date
26-05-17	4	Policy revised, and cover sheet added	Sharon Lawrence (Director)	A Warham	26-05-17
07-12-18	5	Retention periods reviewed and updated	Julie Lawton (Quality Manger)	T Armstrong	07-12-18
05-07-19	6	Section 3 Policy Requirements, subsection b – Awarding Organisations retention of data	Julie Lawton (Quality Manger)	T Armstrong	05-07-19
24-06-20	7	Reviewed; no amendments made	Sarah Booth (HR Assistant)	D Read	16-07-20