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| Triton Training Limited | System of Work | PAGE ISSUE DATE REVIEW | Page 1 of 21 Two 01/01/2021 01/01/2022 |
| TITLE: ATC Document Retention Policy | | APPROVED BY: Directors | |

1. Document Retention Policy

Triton Training recognises that the efficient management of its records is necessary to support the core functions of the company and to comply with its legal and regulatory obligations. This document provides the policy framework through which this effective management can be achieved and audited.

2. Scope of the Policy

The Policy applies to all records created, received or maintained by Triton Training staff in the course of carrying out their Approved Training Centre functions. Records and documentation created in the course of research, whether internally or externally funded, are also subject to contractual record-keeping requirements.

Records are defined as all those documents which facilitate the business carried out by the Triton Training and which are thereafter retained to provide evidence of its transactions or activities. Records may be created, received and retained electronically or in hard copy.

Some of Triton Training's records may be selected for permanent preservation as part of qualification archives, for example, for legal compliance and as an enduring record of the conduct of the business.

3. Compliance

Compliance with this policy will facilitate compliance not only with information-related legislation (specifically the Freedom of Information Act 2000 and the Data Protection Act 1998), and Human Rights Act 1998 (Article 10 right to privacy) but also with any other legislation or regulations (including audit, equality and diversity) affecting Triton Training.

4. Retention and Disposal of Records

Triton Training will seek to:

- Identify records that are appropriate to archive.
- Consider issues such as cost, space utilisation, long term quality of storage, the medium of storage and accessibility when determining how to archive materials.
- Regularly review materials that are archived and dispose of materials that it is no longer appropriate to retain.

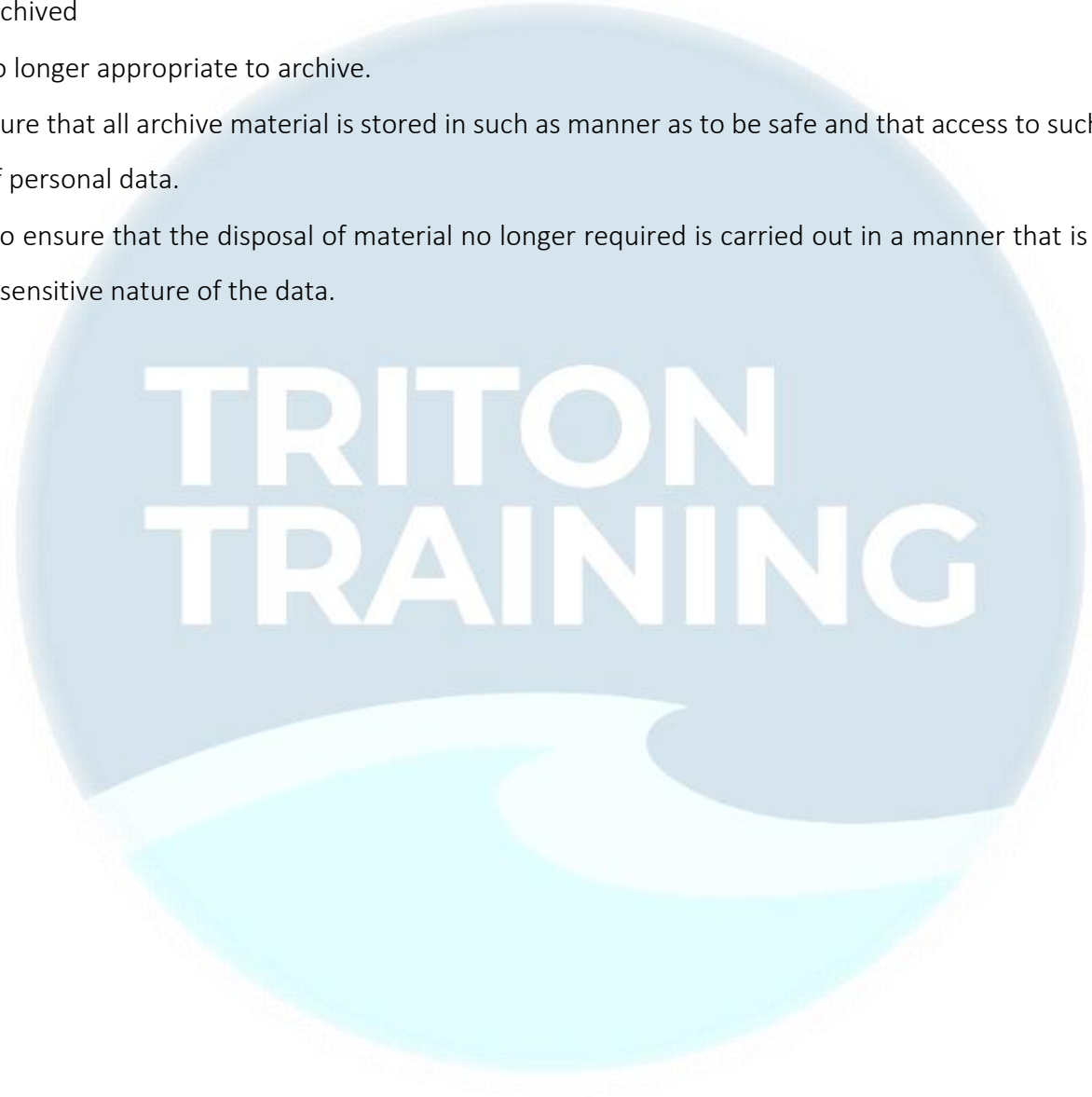
The Directors have overall responsibility for the implementation of this policy and will determine the most suitable location for the storage of archive material and the most appropriate medium for the storage of archive material.

5. Approved Training Centre requirements

- Triton Training has a corporate responsibility to maintain its records and record-keeping systems in accordance with the regulatory environment. The Directors have overall responsibility for this policy.
- Individual staff must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the Triton Training's records management guidelines.

Triton Training will annually review:

- All materials to be archived
- Materials that it is no longer appropriate to archive.
- They should also ensure that all archive material is stored in such a manner as to be safe and that access to such material is controlled to ensure the confidentiality of personal data.
- The directors will also ensure that the disposal of material no longer required is carried out in a manner that is safe and that takes into account the confidential and sensitive nature of the data.



6. Updates of Procedure

| Issue | Written, Checked and Approved | Issue Date | Action by |
|-------|-------------------------------|------------|-----------------|
| 1 | Written, Checked and Approved | 01/07/2020 | Krystal Buckley |
| 2 | Written, Checked and Approved | 01/01/2021 | Krystal Buckley |

Internal Documents & Forms

1. Appendix 1

Appendix 1 sets out guidelines for the retention period of records created and maintained by Triton Training in the course of its business. The appendix refers to all information regardless of the media in which it is stored. Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirements of the Data Protection Act 1998 and the Freedom of Information Act 2000. This appendix will require reviewing on an annual basis.

2. Triton Training Appeals Policy
3. Triton Training Complaints Policy
4. Triton Training Data Protection Policy
5. Triton Training Equal Opportunities & Diversity Policy
6. Triton Training Health & Safety Policy
7. Triton Training Safeguarding Policy
8. Triton Training Special Considerations & Reasonable Adjustments Policy

Sources of Information

1. DBS Guidance & Procedure www.dbscheckonline.org.uk
2. Government Legislation <http://www.legislation.gov.uk/>
3. Management of Health and Safety at Work Regulations <http://www.legislation.gov.uk/>
4. Special Educational Needs and Disability Act 2001 <http://www.legislation.gov.uk/>
5. RLSS Guidance Documents.
6. Swim England Guidance Documents.
7. STA Guidance Documents.

The logo for Triton Training is a large, light blue circle. Inside the circle, the words "TRITON" and "TRAINING" are written in a bold, white, sans-serif font, stacked one above the other. Below the text, there is a stylized wave graphic in shades of light blue and white, suggesting water or a swimmer's movement.

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Approved by: Directors

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Appendix 1

Appendix 1- Records Retention Period

1. Staff Related

| | Basic File Description | Related Policy/ Procedure | Data Protection Issues | Electronic/ Paper Based | Retention period | Reason | Responsibility + Action at the end of the Retention Period | Location |
|-----|---|--|------------------------|-------------------------|--|---|--|--|
| 1.1 | Staff Personal files/ Subcontractor personal Files. | Data Protection and HR Policies and Procedures | Yes | Electronic | Termination + 7 years | Limitation period for litigation; Provision of references | Directors DESTROY | Director's password protected files. |
| 1.2 | Timesheets; Wages and salary records | Financial Regulations | Yes | Electronic | 6 years from the last date of employment | Taxes Management Act (1970) | Directors DESTROY | XERO Director's password protected files. |
| 1.3 | Recruitment including application forms and interview notes | Recruitment and Selection Policy | Yes | Electronic | Date of Interview + 6 months | | Directors DESTROY | Director's password protected files. |
| 1.4 | Advertising of vacancies | Recruitment and Selection Policy | No | Electronic | 1 year | | Directors DESTROY | Director's password protected files. |
| 1.5 | Pre-employment vetting information (Inc. CRB checks) | DBS Guidance & Procedure | Yes | Electronic | Date of check + 6 months | | Directors DESTROY | Director's password protected files. |

| | Basic File Description | Related Policy/ Procedure | Data Protection Issues | Electronic/ Paper Based | Retention period | Reason | Responsibility + Action at the end of the Retention Period | Location |
|------|---|------------------------------------|------------------------|-------------------------|--|--|--|--|
| 1.6 | Disciplinary proceedings | | | | | | | |
| 1.6a | Stage 1 - Oral warning | Disciplinary Procedure | Yes | Electronic | Date of warning + 4 months | | Directors DESTROY | Director's password protected files. |
| 1.6b | Stage 2 – Written warning | Disciplinary Procedure | Yes | Electronic | Date of warning + 8 months | | Directors DESTROY | Director's password protected files. |
| 1.6c | Stage 3 – Final written warning | Disciplinary Procedure | Yes | Electronic | Date of warning + 16 months (although, in exceptional cases, the period may be longer) | | Directors DESTROY | Director's password protected files. |
| 1.7 | Income tax and NI Returns; Correspondence with Tax Office | Financial Regulations & Procedures | Yes | Both | 3 years after the end of the financial year to which the records relate | Income Tax (Employment Regulations) 1993 | Directors DESTROY | Triton Training Offices Orpington XERO Director's password protected files. |

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| 1.8 | Health records | Sickness absence Policy; Stress Policy | Yes | Electronic | During employment | Management of Health and Safety at Work Regulations | Directors DESTROY | Director's password protected files. |
| 1.9 | Health records where reason for termination of employment is concerned with health, including stress related illness | Sickness absence Policy; Stress Policy | Yes | Electronic | 3 years | Limitation period for personal injury claims | Directors DESTROY | Director's password protected files. |
| 1.10 | Records relating to accident/injury at work | Health & Safety Policy | Yes | Electronic | Date of incident + 12 years | Records relating to accident/injury at work | Directors DESTROY | Director's password protected files. |
| 1.11 | Appraisal Records and Probationary Reviews | Appraisal and Probationary Procedures | No | Electronic | Current year + 5 years | Appraisal Records and Probationary Reviews | Directors DESTROY | Director's password protected files. |

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2. Health and Safety

| | Basic File Description | Related Policy/ Procedure | Data Protection Issues | Electronic/ Paper Based | Retention period | Reason | Responsibility + action at the end of the Retention Period | Location |
|-----|------------------------|---------------------------|------------------------|-------------------------|--|--------------------------|--|--------------------------------------|
| 2.1 | Accident Reporting | H&S Policy | No | Both | Date of incident + 7 years for adults Learners under 18 have until their 25 th birthday to make a claim for negligence | Purposes of Civil Claims | Directors DESTROY | Director's password protected files. |
| 2.2 | Incident reports | H&S Policy | Yes | Both | Current year + 20 years | | Directors DESTROY | Director's password protected files. |
| 2.3 | Policy Statements | H&S Policy | No | Both | Date of Expiry + 1 year | | Directors DESTROY | Director's password protected files. |
| 2.4 | Risk Assessments | H&S Policy | No | Both | Current year + 3 years | | Directors DESTROY | Director's password protected files. |

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9. Governance and Management

| | Basic File Description | Related Policy/ Procedure | Data Protection Issues | Electronic/ Paper Based | Retention period | Reason | Responsibility + action at the end of the Retention Period | Location |
|-----|-----------------------------|--|------------------------|----------------------------|--------------------------|-------------------|--|--------------------------------------|
| 3.1 | Legal Framework | ATC Documentation & Articles of Governance | No | Electronic | Life of Triton Training | Legal Requirement | Directors DESTROY | Director's password protected files. |
| 3.2 | Reports | | No | Electronic | Date of report + 6 years | | Directors DESTROY | Director's password protected files. |
| 3.4 | Strategic Development Plans | | No | Electronic | Whilst operational | | Directors DESTROY | Director's password protected files. |

10. Audit

| | Basic File Description | Related Policy/ Procedure | Data Protection Issues | Electronic/ Paper Based | Retention period | Reason | Responsibility + action at the end of the Retention Period | Location |
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| 4.1 | Internal and External Audit Reports | External/Internal Audit Procedure SE,STA,RLSS; Financial Regulations | Yes | Electronic | 6 years after publication | Legal Requirement | Directors DESTROY | Director's password protected files. |
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11. Legal Affairs

| | Basic File Description | Related Policy/ Procedure | Data Protection Issues | Electronic/ Paper Based | Retention period | Reason | Responsibility + action at the end of the Retention Period | Location |
|-----|-------------------------------------|--|------------------------|----------------------------|-----------------------------------|-------------------|--|--------------------------------------|
| 5.1 | Legal Claims | Insurance Policies; Disciplinary Procedure; | Yes | Both | 6 years after settlement of claim | Legal Requirement | Vice Principal – Quality & Standards (insurance) SHRED/DESTROY | Director's password protected files. |
| 5.2 | Litigation records (precedents set) | H&S Policy; Raising Issues of Public | Yes | Both | Life of Triton Training | Legal Requirement | Directors DESTROY | Director's password protected files. |

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| 5.3 | Litigation records (No precedents) | Concern; Grievance Procedure Risk Management Policy and Risk Register | Yes | Both | 6 years after settlement of claim | Legal Requirement | Directors DESTROY | Director's password protected files. |
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12. Insurance Management

| | Basic File Description | Related Policy/ Procedure | Data Protection Issues | Electronic/ Paper Based | Retention period | Reason | Responsibility + action at the end of the Retention Period | Location |
|-----|--|--|------------------------|----------------------------|--|--------|--|--------------------------------------|
| 6.1 | Insurance Policies – Employer's Liability | Financial Regulations | No | Electronic | Minimum of 6 years and a maximum of 40 years | | Directors DESTROY | Director's password protected files. |
| 6.2 | Records of insurance claims – damage to property | Financial Procedures Damage, Loss & Theft Procedure | Yes | Both | 3 years after settlement of claim | | Directors DESTROY | Director's password protected files. |
| 6.3 | Records of insurance claims – personal injury | Financial Procedures H&S Policy | Yes | Both | 6 years after settlement of claim | | Directors DESTROY | Director's password protected files. |

13. Procurement

| | Basic File Description | Related Policy/ Procedure | Data Protection Issues | Electronic/ Paper Based | Retention period | Reason | Responsibility + action at the end of the Retention Period | Location |
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| 7.1 | Contract records. | Financial Procedures | No | Both | Contract completion date + 12 years | | Directors DESTROY | Director's password protected files. |
| 7.2 | Contract monitoring records | Financial Procedures | No | Paper | Current year + 2 years | | Directors DESTROY | Director's password protected files. |

14. Financial Management

| | Basic File Description | Related Policy/ Procedure | Data Protection Issues | Electronic/ Paper Based | Retention period | Reason | Responsibility + action at the end of the Retention Period | Location |
|-----|-----------------------------|--------------------------------------|------------------------|-------------------------|------------------------|--|--|--|
| 8.1 | Financial records | Financial Regulations and Procedures | No | Both | Current year + 6 years | VAT and Tax Regulations; Limitation Act 1980 | Directors DESTROY | Triton Training Offices Orpington XERO Director's password protected files. |
| 8.2 | Annual Financial Statements | Financial Regulations | No | Paper | Current year + 6 years | | Directors DESTROY | Triton Training Offices Orpington XERO Director's password protected files. |

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| 8.3 | Loans and Grants | Financial Regulations ESF Project Files | No | Paper | Date of last payment on loan + 12 years | | Directors DESTROY | Triton Training Offices Orpington XERO Director's password protected files. |
| 8.4 | Risk Register | Financial Regulations Risk Management Policy | No | Electronic | Current year + 6 years | | Directors DESTROY | Triton Training Offices Orpington XERO Director's password protected files. |
| 8.5 | Finance Returns | Financial Memorandum | No | Electronic | Current year + 6 years | VAT and Tax Regulations; Limitation Act 1980 | Directors DESTROY | Triton Training Offices Orpington XERO Director's password protected files. |

15. Student Records

| | Basic File Description | Related Policy/ Procedure | Data Protection Issues | Electronic/ Paper Based | Retention period | Reason | Responsibility + action at the end of the Retention Period | Location |
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| 9.1 | Individual Learner Records including enrolment form and amendment form; withdrawal/transfer information; change of student details | Data Protection; ATC Enrolment Procedure SE,STA,RLSS; ESF Project Files | Yes | Electronic | Termination of the relationship with the student + 6 years (including records relating to a student who has withdrawn from the organisation) | Funding body audit purposes | Directors DESTROY | Director's password protected files. |
| 9.2 | Applications for Admission - successful students | ATC Enrolment Procedure SE,STA,RLSS; ESF Project Files | Yes | Electronic | End of relationship with student + 1 year | Funding body audit purposes | Directors DESTROY | Director's password protected files. |
| 9.3 | Applications for Admission - unsuccessful students | ATC Enrolment Procedure SE,STA,RLSS; ESF Project Files | Yes | Electronic | Resolution of any appeal + 1 year | Funding body audit purposes | Directors DESTROY | Director's password protected files. |
| 9.4 | Records documenting individual student attendance | ATC Student Absence Procedure | Yes | Electronic | Current academic year + 3 years | Funding body audit purposes | Directors DESTROY | Director's password protected files. |
| 9.5 | Records relating to the registration of individual students on programmes and examination results | ATC Enrolment & Certification Procedure SE,STA,RLSS; | Yes | Electronic | Termination of relationship with student + 6 years | Funding body audit purposes | Directors DESTROY | Director's password protected files. |
| 9.6 | Records documenting individual attendance at examinations and handling requests for mitigating circumstances | Student Support Statement | Yes | Electronic | Current academic year + 1 year | Funding body audit purposes | Directors DESTROY | Director's password protected files. |

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| | | ATC Assessment Procedure SE,STA,RLSS; | | | | | | |
| 9.7 | Pass lists/awards lists | ATC Enrolment & Certification Procedure SE,STA,RLSS; | Yes | Electronic | Issue of list + 10 years | Funding body audit purposes | Directors DESTROY | Director's password protected files. |
| 9.8 | Records relating to the handling of individual student requests for personal data including statements/results/ transcripts | Data Protection Policy; Freedom of Information ATC Assessment Procedure SE,STA,RLSS; | Yes | Electronic | Last action on request + 1 year | Funding body audit purposes | Directors DESTROY | Director's password protected files. |
| 9.9 | Records relating to the registration of individual students on programmes and examination results | ATC Enrolment & Certification Procedure SE,STA,RLSS; | Yes | Electronic | Termination of relationship with student + 6 years | Funding body audit purposes | Directors DESTROY | Director's password protected files. |
| 9.10 | Assessment and Verification records including records relating to the academic progress of individual student (including any action | ATC Assessment Procedure SE,STA,RLSS; ESF Project Files | Yes | Electronic | Termination of relationship with student + 3 years | Funding body audit purposes | Directors DESTROY | Director's password protected files. |
| 9.11 | Reports made to deal with unsatisfactory progress); details relating to submission and marking of coursework | ATC Assessment Procedure SE,STA,RLSS; ATC Appeals Policy | Yes | Electronic | Last action + 3 years | Funding body audit purposes | Directors DESTROY | Director's password protected files. |

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| 9.12 | Records relating to disciplinary action (also applies to Appeals) | ATC Incident Report ATC Appeals Policy | Yes | Electronic | Last action + 6 years Last action + 3 years | Funding body audit purposes | Directors DESTROY | Director's password protected files. |
| 9.13 | Records relating to formal student complaints (complaint not dealt with through Complaints procedure) | ATC Appeals Policy ATC Complaints Policy | Yes | Electronic | Termination of relationship with student + 1 year | Funding body audit purposes | Directors DESTROY | Director's password protected files. |
| 9.14 | Student files/work not collected by the student on leaving the College | | No | Both | Termination of relationship with student + 1 year | Funding body audit purposes | Directors DESTROY | Director's password protected files. |
| 9.15 | Statement (including a proposed or amended Statement) maintained under the Education Act 1996 – section 324 | Equal Opportunities (Students); ATC Enrolment & Certification Procedure SE,STA,RLSS; | Yes | Electronic | Termination of relationship with student + 6 years For learners under 18, records should be retained until their 30 th birthday as a minimum | Funding body audit purposes Special Educational Needs and Disability Act 2001 | Directors DESTROY | Director's password protected files. |
| 9.16 | Special Educational Needs files, reviews and individual education plans | Equal Opportunities (Students); ATC Enrolment & Certification | Yes | Electronic | Termination of relationship with student + 6 years For learners under 18, records should be | Special Educational Needs and Disability Act 2001 | Directors DESTROY | Director's password protected files. |

| | | | | | | | | |
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| | | Procedure SE,STA,RLSS; | | | retained until their 25 th birthday as a minimum | | | |
| 9.17 | Advice & Guidance Documentation | ATC Policies & Procedures SE,STA,RLSS Guidance & Procedures ESF Project Files | Yes | Both | Termination of relationship with student + 3 years | | Directors DESTROY | Director's password protected files. |



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16. Safeguarding & Child Protection

| | Basic File Description | Related Policy/ Procedure | Data Protection Issues | Electronic/ Paper Based | Retention period | Reason | Responsibility + action at the end of the Retention Period | Location |
|------|--|---|------------------------|----------------------------|---|---|--|--------------------------------------|
| 10.1 | Child protection files | ATC Safeguarding Policy | Yes | Electronic | Termination of relationship with student or for learners under 18, until their 25 th birthday | Education Act 2002, s175, related guidance "Safeguarding Children in Education," September 2004 | Directors DESTROY | Director's password protected files. |
| 10.2 | Allegation of a child protection nature against a member of staff, including where the allegation is unfounded | ATC Safeguarding Policy ATC Incident Report ATC Complaints Policy | Yes | Both | Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer | Employment Practices Code: Education Act 2002 guidance "Dealing with Allegations of Abuse against teachers and other staff" November 2005 | Directors DESTROY | Director's password protected files. |
| 10.3 | Accessibility Strategy | ATC Safeguarding Policy | Yes | Both | Termination of relationship with student or for learners under 18, until their 25 th birthday | Special Educational Needs and Disability Act 2001 | Directors DESTROY | Director's password protected files. |

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17. Documentation relating to Property/ Site/Area Rental

| | | | | | | | | |
|------|---|----------------------------------|----|------|---------------------------|--|----------------------|--------------------------------------|
| 11.1 | Leases | Financial Procedures | No | Both | Expiry of lease + 6 years | | Directors DESTROY | Director's password protected files. |
| 11.2 | Lettings | Financial Procedures | No | Both | Current year + 3 years | | Directors DESTROY | Director's password protected files. |
| 11.3 | Site Rental Agreements | Site Specific ATC SLA | No | Both | Current year + 3 years | | Directors DESTROY | Director's password protected files. |
| 11.4 | Delivery Site Policies/Procedures/Risk Assessments/PSOP | Site Specific PSOP | No | Both | Current year + 6 years | | Directors DESTROY | Director's password protected files. |
| 11.5 | Damage, loss and theft report forms | Damage, loss and theft procedure | No | Both | Current year + 6 years | | Directors DESTROY | Director's password protected files. |
| 11.6 | ATC & Delivery Site Accident/Incident Reports | H&S Policy | No | Both | Current year + 6 years | | Directors DESTROY | Director's password protected files. |

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