

Triton Training Limited	System of Work	PAGE ISSUE DATE REVIEW	Page 1 of 23 Five 28/01/2025 01/01/2026
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 retain and make available to the relevant awarding body and/ or Regulators the following evidence:

- Records of Learner data, workforce data, monitoring activities, such as those relating to initial approval, centre review and external verification for a minimum of five years
- Records of external moderation for all Learners for a minimum of five years
- Records of all reasonable adjustments, special considerations, complaints, conflicts of interest, enquiries and or appeals for a minimum of three years

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. Learner Data

Registration records must be retained for all learners registered with Triton Training and should include details required for registering a learner. They must be retained and made available to the relevant Awarding Body and / or Regulators for up to five years following registration. This information may include:

- Date learners started their qualification (e.g. course / cohort start date)

- Learner name, ULN (where applicable) and date of birth
- Learner contact details
- Evidence of Learner eligibility
- Evidence of Learner pre-requisites (if applicable)
- Date Learners were registered
- Date certificates were claimed
- Learner Outcomes

7. Workforce Data

Workforce Data must be retained and made available to the relevant awarding body and / or Regulators for up to five years.

This information may include:

- Name of all individuals involved in the teaching, learning, assessment, and internal verification of the Learners
- The role they undertook (e.g., Tutor and / or Assessor or IV)
- Evidence of any appropriate / required qualifications
- Evidence of any appropriate licenses (such as the Swim England Educator License (if applicable))

8. Learner Samples

There should be a minimum sample of one complete learner portfolio for each qualification Triton Training delivers each year for monitoring and standardisation activities. The portfolio must be a copy rather than the original, and the Learner's written agreement for its retention must be obtained.

They must be retained and made available to the relevant awarding body and / or Regulators if requested.

9. Assessment Evidence

Assessment Evidence must be retained and made available to the relevant awarding body and / or Regulators for up to one year following registration. This information may include:

- A copy of the Assessment Task versions used (including references to how they are mapped to Learning Outcomes / Assessment Criteria)
- Summary of assessment decisions to include formative and summative decisions and when and by whom the decisions were made

10. Learner Portfolios

Learner work is the property of the Learner and therefore cannot be retained indefinitely. However, access may be required by Triton Training, the relevant awarding body and / or Regulators for purposes of appeal, audit or on-going monitoring. Triton Training will retain copies of Learner work (e.g. portfolios) and require Learners to keep their work for six months following final outcomes and / or the issuing of certificates.

11. Internal Quality Assurance Records

Internal Quality Assurance Records must be retained and made available to the relevant awarding body and / or Regulators for up to one year following registration. This information may include:

- Internal Verification / Quality Assurance Sampling Plans
- Internal Verification sign-off of Assessment Tasks (if applicable)
- Internal Verification reports
- Standardisation activities

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12. Data Protection (Incorporating GDPR)

The retention of any information and evidence described above should always be in line with the requirements of current Data Protection Legislation and General Data Protection Requirements and aligned to the individual organisations related policies and procedures.

13. Updates of Procedure

Issue	Written, Checked and Approved	Issue Date	Action by
1	Written, Checked and Approved	01/07/2020	Krystal Buckley
2	Checked and Approved	01/01/2021	Krystal Buckley
3	Checked and Approved	06/01/2022	Krystal Buckley
4	Checked and Approved	06/01/2023	Krystal Buckley
5	Checked and Approved	28/01/2025	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

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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.



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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.

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	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; H&S Policy;	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)	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 learner details	Data Protection; ATC Enrolment Procedure SE,STA,RLSS; ESF Project Files	Yes	Electronic	Termination of the relationship with the learner + 5 years (including records relating to a learner who has withdrawn from the organisation)	Funding body audit purposes	Directors DESTROY	Director's password protected files.
9.2	Applications for Admission - successful learner	ATC Enrolment Procedure SE,STA,RLSS; ESF Project Files	Yes	Electronic	End of relationship with learner + 1 year	Funding body audit purposes	Directors DESTROY	Director's password protected files.
9.3	Applications for Admission - unsuccessful learner	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 learner attendance	ATC Learner Absence Procedure	Yes	Electronic	Current year + 5 years	Funding body audit purposes	Directors DESTROY	Director's password protected files.
9.5	Records relating to the registration of individual learner on programmes and examination results	ATC Enrolment & Certification Procedure SE,STA,RLSS;	Yes	Electronic	Termination of relationship with learner + 5 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	Learner Support Statement	Yes	Electronic	Current year + 5 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 learner 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 learner on programmes and examination results	ATC Enrolment & Certification Procedure SE,STA,RLSS;	Yes	Electronic	Termination of relationship with learner + 5 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 learner (including any action)	ATC Assessment Procedure SE,STA,RLSS; ESF Project Files	Yes	Electronic	Termination of relationship with learner + 5 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 + 5 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 learner complaints (complaint not dealt with through Complaints procedure)	ATC Appeals Policy ATC Complaints Policy	Yes	Electronic	Termination of relationship with learner + 1 year	Funding body audit purposes	Directors DESTROY	Director's password protected files.
9.14	Learner files/work not collected by the learner on leaving the programme		No	Both	Termination of relationship with learner + 5 years	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 learner + 5 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 (Learner); ATC Enrolment & Certification	Yes	Electronic	Termination of relationship with learner + 5 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 learner + 3 years		Directors DESTROY	Director's password protected files.



The logo for Triton Training features the words "TRITON TRAINING" in a bold, white, sans-serif font. The text is centered within a light blue circular background. Below the circle, there is a stylized wave graphic in shades of light blue and cyan.

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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 learner 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 learner 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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