



DOCUMENT RETENTION POLICY



Document Retention Policy

Introduction

It is Blackburn Gould & Associates (BGA) policy to maintain complete, accurate and high-quality records. Records are to be retained for the period of their immediate use, unless longer retention is required for historical reference, contractual, legal or regulatory requirements or for other purposes as may be set forth below. Records that are no longer required, or have satisfied their required periods of retention, shall be destroyed. All documentation is retained in accordance with GDPR regulations and where applicable, would be made available under Freedom of Information request (FOI).

No director, employee, contractor or volunteer of BGA shall knowingly destroy a document with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any government department or agency or in relation to or contemplation of any such matter or case. This policy covers all records and documents of BGA. BGA reserves the right to amend, alter and replace this policy at any time.

Responsibility for Administration

The Senior Management Team of BGA shall be responsible for administering and policing the application of this policy.

Statement of Policy

It is the policy of this organisation:

- To comply with applicable legal and regulatory duties to retain documents, set out by such agencies as the Education Skills Funding Agency (ESFA), Department of Work and Pensions (DWP / JCP) and European Social Fund (ESF).
- To possess all documents needed for our normal business purposes, including administration of our ongoing business relationships.
- Therefore, the organisation directs and expects all directors, employees, subcontractors and volunteers to follow the rules and procedures set forth herein. Please be aware that "documents" includes not only documents in paper form, but e-mail messages and all other forms of electronically stored information. Also be aware that the rules and procedures apply to all computers and other electronic devices provided to you by the organisation for use in the business of the organisation, regardless of whether those computers or devices are used on the organisation's premises or elsewhere.

Rules and Procedures

You must retain the documents listed the schedule below for the periods of time set forth on that schedule. The schedule reflects our legal obligations for document retention.

Please note that the information listed in the schedule below is intended as a guideline and may not contain all the records BGA may be required to keep in the future. Questions regarding the retention of documents not listed in this schedule should be directed to the Senior Management Team.

Please note that failure to follow this policy can result in possible civil and criminal sanctions against BGA and its directors and employees, and possible disciplinary action against responsible individuals, up to and including termination of employment.

Education Skills Funding Agency. European Social Fund, Local Authority (LA) Skills & Employment schedule.



As a provider delivering ESFA and ESF Projects or ESF / LA match provision delivering training under ESF, BGA and its subcontractors must ensure they retain documents (including match documentation, where appropriate) until the end of the document retention period for the relevant ESF programme (normally six years or 31 December 2029 but will be confirmed once the Operational Programme is approved). This means documents must be retained **until the end of 2029** at the earliest. This date will be reflected in retention documentation and published on the staff intranet.

Paperwork to be retained:

- Recruitment Checklist
- Individual Learning Record (ILR)
- Application Form
- Eligibility Form
- Right to Work in the UK Form
- Training Agreement
- Individual Learning Plan
- Learner’s Awarding Body registration number, if applicable
- Evidence of a learners’ contract of employment, if applicable (i.e., copy of contract, offer letter or letter of confirmation on employers headed paper)
- Visit reports/ Assessment Plans – capturing learning activity and learner progress on an ongoing basis
- Formal progress Reviews – capturing learning activity, learner progress and employer involvement (carried out a minimum of once every 12 weeks)
- Authenticated copy of certificate of achievement
- Written confirmation and supporting evidence of withdrawal from or leaving the programme giving reason for exiting programme, signed by Contractor representative
- Proof of contact hours signed by learner and employer representative
- Learner and employer exit survey (as provided by BGA)
- Proof of final advice and guidance
- Any other requirements laid down by funder from time to time and requested by BGA.

This policy was adopted by: Joseph Ebe-Arthur	Date: 1.8.2022
To be reviewed: Annually	Signed: <i>Joseph Ebe-Arthur</i> Reviewed: 10/11/24