

# Data retention policy

## **Policy statement**

We define records as any data or information in all physical forms or media, created or received by YMCA Awards, our centres or our suppliers whilst carrying out our business activities.

Accurate and relevant records are vital to our services, including qualification delivery. It is important to balance our statutory and contractual obligations (for example, annual reporting requirements), with our duties of confidentiality for personal and sensitive records.

We will follow all relevant legislation – including the UK GDPR and the Data Protection Act, as updated from time to time – and aim to achieve standards of best practice by adopting principles from bodies such as the International Organisation for Standardisation (ISO).

### This Policy outlines:

- our commitment to maintaining records of our activities and those completed on our behalf
- the key principles for managing and disposing of records in all media
- the roles of our stakeholders, including our approved centres.

To enable this policy, we ensure that our staff have access to information management training. We also encourage our staff, approved centres and suppliers to manage records properly by providing supporting standards, procedures and guidelines.

This policy aims to ensure that these records are managed consistently and are only retained for as long as necessary to meet operational and business needs, and to demonstrate compliance with legal and regulatory requirements. It applies to all the listed categories in whatever format they are held (i.e. paper or electronic).

We are aware that information held for longer than is necessary carries an additional degree of risk and cost. We also recognised that records and information should only be retained for legitimate business use and be kept accurate and secure. YMCA Awards will therefore ensure that information is not kept longer than is necessary and will only retain the minimum amount of information that it requires.

#### Scope

This policy applies to the management of all records, data and information – in all physical and digital forms – created or received by YMCA Awards, our centres and our suppliers whilst carrying out activities related to the delivery of our products and services. Examples of records include (but are not limited to):

Learner details including:

First name(s), last name and date of birth

- o Contact information e.g. email address, phone number and/or address
- Gender
- Unique learner number (ULN) and other learner numbers
- Learner achievements including assessment evidence, assessment outcomes and certificates

- Special categories of learner data including medical records (to support reasonable adjustment or special consideration requests)
- Centre information including:

Organisation name(s), phone number(s), email(s) and address(es)

- Website
- UKPRN
- Company number

Centre staff information including:

- First name(s), last name
- o Contact information including email address and phone number
- Qualification certificates and CV
- Site information including contact information (name, role at site, phone number, email address and address)
- Employer information including contact information (contact name, role at employer, phone number, email and address)

More information on data we collect and it's purpose can be found in Schedule 2: Independent data controller to independent data controller data sharing agreement within our Centre Agreement.

## Related policies, procedures and templates

The YMCA Awards Records Retention and Disposal Policy operates alongside and supplements the following Central YMCA policies:

**Data Protection Policy** 

Records Retention and Disposal Policy

This policy is also supported by Schedule 2: Independent data controller to independent data controller data sharing agreement within our Centre Agreement.

## **Centre responsibilities**

Our approved centres must ensure that all records of assessment are complete, securely stored and available for external quality assurance. Records must be retained for a minimum of one year after completion. Where learners are accessing funding to enable access to a qualification, record retention periods are likely to be longer and centres should ensure they review relevant guidance from funders.

A centre must ensure the following records are available to the EQA upon request:

- Dated record of each learner's enrolment into the centre's programme and registration with YMCA Awards.
- Assessment and records internal quality assurance (IQA) records including:
  - Learners' details including YMCA Awards learner number, name, date of birth, reasonable adjustments and special considerations

- Learners' workplace address and contact details (where relevant)
- Signed learner authenticity statements
- Assessment records/plans
- o Relevant subject material assessed with evidence files or portfolios
- All relevant information (dated) relating to learners requiring reasonable adjustments/special considerations
- Assessor name and signature
- IQA reports/plans
- o IQA name and signature (if sampled)
- o Reports detailing feedback, guidance and support of tutors and assessors
- o Dated records of learners' achievements and certification (once completed)
- Minutes of meetings between assessment team and IQA(s)
- Developmental activities and records of training/continued professional development undertaken by assessors and IQAs
- EQA reports and written evidence of any action points implemented
- All relevant information (dated) relating to learner appeals, including copies of documented evidence identifying the nature, date and circumstances surrounding the original notification along with resulting action plans.

To support centres to meet our assessment record requirements, we provide learner assessment record (LAR) templates. Original versions remain the property of the learner but copies must be retained by the centre for the above stated time periods. Scanned/electronic copies are acceptable.

All/any product that has been used to make an assessment judgment and decision must be copied and kept. This is to ensure that, in the case of an appeal (by a learner or centre), or in the case of any discrepancy raised by an External Quality Assurer (EQA), a complete record of evidence is available for adjudication.

#### **Centre sanctions**

Failure to retain sufficient records in line with the requirements above may result in YMCA Awards being unable to certificate learner achievement. This would be a form of malpractice and may result in a centre sanction.

# YMCA Awards' responsibilities

We collect personal data with for two purposes:

 As part of the organisation (centre), staff, qualification and/or qualification component approval processes. YMCA Awards collects and retains personal data relating to individuals working at the organisation to enable them to access YMCA Awards' systems and to determine their suitability to teach, assess and quality assure our qualifications.  To enable YMCA Awards to track learners' progress and achievements for our products and services. We collect and retain personal data on learners to enable us to identify who is completing our qualifications and at which training provider. This information is retained to enable requests to replace lost or damaged certificates of achievement.

Schedule 2: Independent data controller to independent data controller data sharing agreement within our Centre Agreement outlines the legal basis for our collection of personal data and how we share this data with our suppliers, regulators and government departments/agencies.