Record Retention Policy

1. **Overview**

   This Policy should be read in conjunction with the Information Management and Privacy Policy which outlines how Jill Webb Training (JWT) collates and uses your information.

   For accredited qualifications, JWT has completed and signed documents outlining agreed commitments in accordance with Awarding Organisations published procedures, enabling JWT to deliver approved qualifications, use assessment and quality assurance documents and allow access to data by Awarding Organisations and the regulators upon request.

   The aim of this Policy is to ensure that documents are retained for an appropriate length of time and that JWT retains sufficient assessment and quality assurance records to allow for the review of assessment over time.

   Appendix A sets out how records will be retained.

   Appendix B sets out specific requirements for ITC qualifications.

This Policy will be reviewed every three years or earlier if a change in legislation, working practices or feedback from clients or partners necessitates.

This Policy was reviewed and updated in August 2025.

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Appendix A
Record Retention Schedule

Data Collected	How Long Kept For	Rationale
Candidate details for accredited courses (ITC) (*)	JWT retains this data as set out by the Awarding Organisation. For ITC see Appendix B	This minimises the risk of a data breach while information is held locally
Candidate details for certified courses (CPD)(*)	5 years	This covers the duration of any certificate with a renewal date and allows for queries after this date
Managing Inbox when an Associate leaves Emails collated by an associate in the course of their work with Jill Webb Training (using a dedicated email address)	The email address is shut down after 2 weeks and closed completely after 6 months	This allows access to the data in the emails if needed, while not retaining them for any longer than needed
Information to raise invoices and invoice details	7 years	In line with the requirement to hold all accounting paperwork for 7 years (HMRC)
Data collected for marketing purposes – this is in response to a specific question asking if we can retain data for this purpose	Indefinitely	Every mailing gives the individual or company the option to opt out
Recognisable data held in the Zoom software – namely the downloaded Zoom 'chat' or chat within 'Teams'	One month – Zoom Immediately - Teams	The chat in Zoom and Teams is autosaved after each course or meeting. Any reasonable query which needed the chat would arise within this period Note – Teams meetings run by JWT as the owner should have the data deleted immediately.
Feedback forms (Completed by candidates)	For ITC and CPD courses these are retained in the course file on Google Drive and deleted when the course data is deleted as in (*) above. Feedback from other courses is kept for one year from the date of the course. All feedback is shared with tutors and any concerns and actions agreed recorded by email.	Feedback is essential to develop high quality services. This is a proportionate approach to keeping data to learn from.

Ad hoc data collection	Decided on a case by cases basis	For example, if you gave your name and contact details in order for a certificate to be sent to you, this information will be kept until you have received the certificate unless you gave permission for us to keep it longer

Appendix B
Specific Guidance for ITC Qualifications

Learner Registration
JWT collects data from its learner in accordance with defined ITC First criteria and supplied documentation.

Hard copy of the physical registration documents are scanned and sent to ITC. JWT will keep the scanned copy of the physical registration documents for 5 years at the Centre.

Digital information is forwarded to ITC by JWT regarding qualifications enrolled upon and achieved. This is stored by ITC First according to the requirements of the Data Protection Act and GDPR.

Learner details obtained from registration documents are:

- Prefix
- First Name
- Family (Surname) Name
- Date of Birth
- Gender
- Ethnicity (Groups based upon 2001 census question)
- Postal Address
- Postcode
- Email Address
- Telephone
- Mobile
- Special Needs & Reasonable Adjustment Request
- Signature

Learner Assessment
JWT collects data from its learners in accordance with defined ITC criteria identified on the qualification specification and other supplied documentation.

JWT sends all physical assessment evidence it has collected to ITC detailing:

- What was assessed, when and by whom
- The assessment methods
- The assessment decision
- Assessor and learner original signatures

Once the course assessment decisions have been agreed by ITC, all hard copy paperwork is shredded and JWT keeps all relevant documentation for 5 years for each qualification.

Internal Assessment Verification/Quality Assurance

JWT retains all internal verification records and internal quality assurance activity evidence for its Assessors and candidates. These are maintained according to agreed internal quality assurance plans and made available to ITC and regulators upon request.