

Waltham Forest Adult Learning Service WFALS Document Retention Policy (2026/27)

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1. Introduction

Waltham Forest Adult Learning Service (WFALS) retains information only for as long as necessary to meet legal, regulatory and operational requirements. This policy ensures compliance with the Department for Education (DfE) and Education and Skills Funding Agency (ESFA) requirements for record keeping, including the retention of learner files, funding evidence, and qualification records.

Official guidance: <https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers/record-keeping-and-retention-information-for-training-providers>

Records relating to European Social Fund (ESF) activity must be retained until 31 December 2030.

Official guidance: <https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers>

WFALS also complies with the Information Commissioner's Office (ICO) requirements to maintain a documented retention schedule and review retention periods regularly.

Official guidance: <https://ico.org.uk/for-organisations/advice-and-services/audits/data-protection-audit-framework/toolkits/records-management/retention/>

WFALS uses the nationally recognised Jisc Records Retention Management Framework to guide retention of HR, governance, finance, estates, IT and safeguarding records.

Official guidance: <https://www.jisc.ac.uk/guides/records-retention-management>

2. Scope

This policy covers all records created, received or stored by WFALS, including:

- Learner administrative files, ILR documentation and funding evidence
 - Assessment, IQA and EQA records
 - Learner portfolios and samples
 - Safeguarding and wellbeing records
 - Human resources documentation
 - Finance, procurement and contractual records
 - Governance, policy and quality assurance documentation
 - Digital communications, system logs and IT records
 - Estates, facilities and health and safety documentation
 - Marketing materials, publicity content and consent-based media
 - Partnership agreements and data-sharing documentation
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3. Retention Requirements

3.1 ILR, Administrative and Funding Records

Retention Period:

- 6 years from the end of the financial year
- Until 31 December 2030 for ESF-funded provision

Justification: Required under DfE and ESFA record-keeping rules for FE providers.

<https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers/record-keeping-and-retention-information-for-training-providers>

<https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers>

3.2 Learner Evidence, Assessment and Quality Assurance Records

Assessment and IQA Records:

- Retained for 3 years after learner registration

Summative Assessment Evidence:

- Retained for 1 year after the issue of results

Learner Portfolios:

- Retained according to awarding-body requirements
 - WFALS retains portfolios until:
 - Certification is issued
 - EQA/EV sampling is complete
 - Any appeal window has closed
 - Plus 1 additional year unless awarding-body rules require longer
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3.3 Safeguarding and Wellbeing Records

Adult safeguarding:

- Retained for 6 years after case closure

Learners aged 16–18 or 19–25 with an EHCP:

- Retained until age 25, or
 - Up to 75 years for serious or complex cases
(Jisc FE/HE safeguarding retention guidance)
<https://www.jisc.ac.uk/guides/records-retention-management>
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3.4 Human Resources Records

Personnel Files:

- Retained for 6 years after employment ends
(Justified via Jisc FE/HE retention categories)
<https://www.jisc.ac.uk/guides/records-retention-management>

Recruitment (unsuccessful applicants):

- Retained for 1 year

DBS Checks:

- DBS certificates not retained
- DBS outcome records retained for up to 6 months

Training and CPD Records:

- Retained for 3–6 years
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3.5 Governance and Quality Assurance Records

Policies and Procedures:

- Retained for 7 years after being superseded
(Jisc FE/HE governance category)
<https://www.jisc.ac.uk/guides/records-retention-management>

Committee Minutes:

- Permanent for strategic committees
- Retained for 7 years for operational committees

Quality Assurance Evidence (SAR, QIP, audits):

- Retained for 6 years
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3.6 Finance and Procurement Records

Financial Documentation (invoices, receipts, ledgers):

- Retained for 6 years
(Companies Act/HMRC requirement)

Contracts and Agreements:

- Retained for the term of the contract plus 6 years

Asset Registers:

- Retained for the life of asset plus 6 years
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3.7 Digital Systems, IT and Communication Records

Staff Email:

- Retained for 2 years unless saved as a formal record (ICO storage limitation requirement)
<https://ico.org.uk/for-organisations/advice-and-services/audits/data-protection-audit-framework/toolkits/records-management/retention/>

Teams Messages:

- Retained for 90 days to 1 year

System Access and Audit Logs:

- Retained for 1–2 years (Jisc digital records guidance)
<https://www.jisc.ac.uk/guides/records-retention-management>

Backups:

- Retained for 30–90 days
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3.8 Estates, Facilities and Health and Safety Records

Accident/Incident Reports:

- Retained for 6 years

Fire Safety Records:

- Retained for 6 years

Risk Assessments:

- Retained for 3–6 years depending on risk level
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3.9 Marketing, Communications and Media Records

Marketing Materials:

- Retained for 1 year

Website and Social Media Archives:

- Retained for 2 years

Photography, Video and Testimonials (consent-based):

- Retained for 3 years
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3.10 Partnerships, Contracts and Data-Sharing Records

Partnership Agreements, SLAs and MoUs:

- Retained for the term of the agreement plus 6 years

Data-Sharing Agreements:

- Retained for 6 years after being superseded
(ICO accountability requirements)
<https://ico.org.uk/for-organisations/advice-and-services/audits/data-protection-audit-framework/toolkits/records-management/retention/>
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4. Principles of Retention and Disposal

WFALS follows these principles:

- Records must be kept only for as long as necessary
 - Retention periods must be justifiable and documented
 - Retention must comply with statutory, funding body and awarding body requirements
 - Records must be disposed of securely at the end of their retention period
 - Learners must be treated fairly and transparently when their portfolios are returned or destroyed
 - Over-retention must be avoided in line with ICO expectations
<https://ico.org.uk/for-organisations/advice-and-services/audits/data-protection-audit-framework/toolkits/records-management/retention/>
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5. Roles and Responsibilities

- Curriculum and Quality Managers: ensure adherence to awarding body requirements
 - MIS Team: manages digital learner records and ILR documentation
 - Safeguarding Leads: manage retention of safeguarding documentation
 - Centre and Administrative Teams: ensure secure handling and disposal of records
 - All staff: must ensure adherence to the retention schedule, policy and disposal rules
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6. Whole-Service Retention Schedule (Summary)

WFALS maintains a detailed retention schedule:

Appendix 1: WFALS Retention Schedule (2026/27)

Key retention periods include:

- ILR and funding evidence: 6 years, or until 31 December 2030 for ESF-funded provision
- Safeguarding records (adults): 6 years after case closure
- Safeguarding records (16–18 or 19–25 with EHCP): until age 25 or up to 75 years for serious cases
- HR records: 6 years after employment ends
- Recruitment (unsuccessful): 1 year
- Financial records: 6 years
- Contracts and agreements: contract term plus 6 years
- Policies and procedures: 7 years after superseded
- IT logs and audit trails: 1–2 years
- Emails: 2 years unless formally archived

All periods reflect statutory requirements, Jisc retention standards, or sector-standard FE practice.

<https://www.jisc.ac.uk/guides/records-retention-management> [\[educationfunding.uk\]](https://www.educationfunding.uk)

7. Learner Evidence and Assessment Records

WFALS retains learner evidence according to awarding-body requirements and sector norms.

Assessment and IQA Records

- Retained for 3 years after learner registration

Summative Assessment Evidence

- Retained for 1 year after results are issued

Learner Portfolios

Awarding body requirements vary (from 4 weeks to 6 months or until EQA/appeals are complete).

WFALS standard approach:

- Retain until certification is issued
 - Retain until EQA/EV sampling is complete
 - Retain until any appeal period has ended
 - Retain for an additional 1 year, unless awarding-body rules require longer
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8. Portfolio Return and Destruction Process

WFALS follows a three-stage process for returning learner portfolios:

Stage 1 – Initial Notice

Learners are informed their portfolio is ready for collection and are given a 60–90 day collection window.

Stage 2 – Reminder

A reminder is issued halfway through the collection period.

Stage 3 – Final Notice

A final notice is issued at least 14 days before the destruction deadline.

If a portfolio is not collected after the final deadline:

- It is securely destroyed
 - WFALS records the learner name/ID, qualification, dates of notices and destruction date
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9. Storage and Security

WFALS stores records securely in line with DfE expectations.

<https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers/record-keeping-and-retention-information-for-training-providers>

[\[customerhelpline.gov.uk\]](#)

- Paper records are kept in secure, fire-resistant, lockable storage
 - Digital records are stored in secure systems that meet local authority standards
 - Access is restricted to authorised staff only
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10. Digital vs Physical Records

Where awarding bodies permit digital evidence, WFALS may digitise physical records. Digitised records must be accurate, secure and accessible for audit or quality assurance. Digital backups operate on a 30–90 day rolling cycle.

11. Transfer of Records

When a learner transfers or a contract ends, WFALS transfers required learner files or ILR evidence to the receiving organisation or funding body in line with DfE expectations.
<https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers/record-keeping-and-retention-information-for-training-providers>
[\[customerhe...ion.gov.uk\]](#)

Records not required for transfer remain subject to WFALS retention periods and secure disposal procedures.

12. Disposal and Destruction

Records reaching the end of their retention period are destroyed securely using local authority–approved confidential waste or secure digital deletion.

Disposal must be:

- Secure
- Documented
- Irreversible

WFALS complies with ICO requirements for secure disposal.

<https://ico.org.uk/for-organisations/advice-and-services/audits/data-protection-audit-framework/toolkits/records-management/retention/>

13. Monitoring and Review

WFALS reviews this policy annually or sooner if legislation, funding rules or awarding body requirements change.

The retention schedule is updated in line with ICO expectations for regular review.

<https://ico.org.uk/for-organisations/advice-and-services/audits/data-protection-audit-framework/toolkits/records-management/retention/>

External References

DfE/ESFA Record-Keeping Guidance for FE Providers

<https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers/record-keeping-and-retention-information-for-training-providers>
[\[customerhe...ion.gov.uk\]](#)

DfE General FE Retention Guidance

<https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers> [\[WFALS_Docu...5-26_DRAFT | Word\]](#)

ICO Records Management and Retention

<https://ico.org.uk/for-organisations/advice-and-services/audits/data-protection-audit-framework/toolkits/records-management/retention/> [\[qualificat...tion_table | Excel\]](#)

Jisc Records Retention Management Framework

<https://www.jisc.ac.uk/guides/records-retention-management> [\[educationfunding.uk\]](#)

Appendix 1: WFALS Retention Schedule (2026/27)

Category	Record Type	Retention Period	Official Justification
Learner Administration & Funding	ILR records	6 years from end of financial year	DfE/ESFA FE retention guidance
Learner Administration & Funding	Funding & eligibility evidence	6 years	DfE/ESFA FE retention guidance
Learner Administration & Funding	ESF-funded documentation	Retain until 31 December 2030	DfE/ESFA FE retention guidance
Learner Evidence & Assessment	Assessment records	3 years after learner registration	Awarding-body/sector norm
Learner Evidence & Assessment	IQA documentation	3 years	Awarding-body/sector norm
Learner Evidence & Assessment	Summative assessment evidence	1 year after results	Appeals cycle requirement
Learner Evidence & Assessment	Learner portfolios	Certification + EQA + appeals + 1 year	WFALS unified rule
Safeguarding	Adult safeguarding files	6 years after case closure	LA practice / Limitation Act
Safeguarding	Safeguarding (16–18 or 19–25 EHCP)	Until age 25 or up to 75 years	Jisc safeguarding guidance
Human Resources	Personnel files	6 years after employment ends	Jisc HR retention guidance
Human Resources	Recruitment (unsuccessful applicants)	1 year	Employment standards
Human Resources	DBS outcome record	Up to 6 months	ICO DBS principles
Human Resources	Training & CPD	3–6 years	Jisc HR retention guidance
Governance & Quality	Policies & procedures	7 years after superseded	Jisc governance guidance

Governance & Quality	Strategic committee minutes	Permanent	Governance standards
Governance & Quality	Operational committee minutes	7 years	Jisc governance guidance
Governance & Quality	Quality assurance documents	6 years	FE quality cycle
Finance & Procurement	Financial records	6 years	HMRC requirement
Finance & Procurement	Contracts & agreements	Contract term + 6 years	Limitation Act
Finance & Procurement	Asset registers	Life of asset + 6 years	Audit requirement
IT & Digital	Staff email	2 years unless archived	ICO storage limitation
IT & Digital	Teams messages	90 days – 1 year	Business need
IT & Digital	System access logs	1–2 years	Jisc digital guidance
IT & Digital	System backups	30–90 days	IT standard practice
Estates & H&S	Accident/incident reports	6 years	Limitation Act
Estates & H&S	Fire safety records	6 years	Fire safety compliance
Estates & H&S	Risk assessments	3–6 years	H&S practice
Marketing & Communications	Marketing materials	1 year	Business need
Marketing & Communications	Website/social media archives	2 years	Business need
Marketing & Communications	Photography/video/testimonials	3 years	GDPR storage limitation
Partnerships & Data Sharing	Partnership agreements/SLAs/MoUs	Contract term + 6 years	Limitation Act
Partnerships & Data Sharing	Data-sharing agreements	6 years after superseded	ICO accountability requirements