

ACE360 Data Archive and Retention Policy

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To comply with GDPR, Customer Requirements and ensure that ACE360 remains responsive and sustainable, the following archiving and data retention policy applies.

Background - Compliance with UK General Data Protection Regulation (UK GDPR).

Summary of the regulations:

- You must not keep personal data for longer than you need it.
- You need to think about – and be able to justify – how long you keep personal data. This will depend on your purposes for holding the data.
- You need a policy setting standard retention periods wherever possible, to comply with documentation requirements.
- You should also periodically review the data you hold, and erase or anonymise it when you no longer need it.
- You must carefully consider any challenges to your retention of data. Individuals have a right to erasure if you no longer need the data.
- You can keep personal data for longer if you are only keeping it for public interest archiving, scientific or historical research, or statistical purposes.

Customer Requirements

- End Point Assessment Organisations (EPAOs) have a duty to maintain records for 6 years from the end of assessment for quality assurance purposes.
- Lead Training Providers (LTPs) have a duty to retain Learner files for 6 years from Financial Year End after end of course.

Type of record	Retention period	Action
Learner records: • Details of learner • Course studied • Learner eligibility	6 years from Financial Year End after last payment made	Destroy records older than 7 years. List all remaining records with full name, course studied & course dates.
'Live' Portfolios (paper and electronic)*	2 years from end of course	Destroy records older than 2 years. List all remaining records with full name, course studied & course dates.

***Note:** these are the Portfolios that relate to current learning and certificates haven't been claimed

Source: [ESFA Guidance](#)

Background - ACE360 Data Management

There is a need to ensure that the volume of data ACE360 holds doesn't impact on its responsiveness.

Completed records should be moved into an archived state so that users can focus on their current and active records that they need to actively manage.

Archiving and Data Retention Policy

Definitions:

Final Grade (pass)	The date of any final pass grade
Withdrawal	The date the Training Provider withdrew the learner - ACE360 action "Withdraw this learner"
Last status change	When an Apprentice record moves between the following statuses: ➤ In Training ➤ Evidence Complete ➤ Gateway Approved ➤ EPA Ready ➤ EPA Progress ➤ EPA Passed
End of Course	Date of final grade, withdrawal or inactivity (no ACE360 status change for 18 months)

Timescale	Retention	Need to retain
18 months after: ➤ Final grade* ➤ Withdrawal ➤ Last status change OR ➤ Inactivity <i>Any record where there is no status change</i> <i>* If the final grade is a 'fail' and is then subject to a resit, re-take or appeal, the later grade date (following resit, re-take or appeal decision) is used.</i>	Automatically move the record complete with attached evidence to 'archive' state. Retain all evidence files.	In case of internal or external quality audit. In case of funding audit. To be able to answer questions from the Apprentice, or other entity that has a legitimate question.
2 years from end of course	Delete and destroy attached evidence files but retain the core record including the following: ➤ Apprentice Basic information ➤ Standard / Version / Option ➤ Apprentice Contact Information ➤ Learning Support ➤ Reasonable adjustments ➤ Identifiers ➤ Employer Company name and contact information ➤ Activity log ➤ System dates for status changes ➤ Component grades ➤ Overall grade ➤ Certification status	In case of funding audit. To be able to request a certificate reprint. To be able to monitor grading outcomes over time in relation to the Standard, Apprentice age / disability or reasonable adjustment.
7 years from end of course* <i>*End of course is defined as the date of final grade, withdrawal date or 18 months of inactivity (no status change)</i>	Destroy records older than 7 years.	

End of Contract

Where an ACE360 customer ceases to use ACE360 for whatever reason, the above archiving and data deletion policy would continue to be observed based on the age of the individual records.

Alternatively, an LTP (Training Provider) ACE360 user can provide written instructions confirming data deletion as required. Any records that have been “approved for EPA” in ACE360 would also need the authority of the related EPAO account before deletion as they would be an active data processor in this state.

Data deletion requires a total of 40 days to complete, this includes 30 days from the point of deletion to the point when all our backups are purged.