

ual ■ awarding
body

Retention Policy for Approved Centres

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Managed by: Information Compliance Manager

Approved by: Quality Assurance and Enhancement Steering Group (QAESG)

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Ella Rudge, 'Mollie's World', UAL Level 3 Extended Diploma
in Creative Practice: Art, Design and Communication,
West Suffolk College, Image by Hatch Films CIC

1. Overview of the Policy

1.1 Purpose of the Policy

This Retention Policy (the Policy) sets out the UAL's requirements for the retention, storage, and secure disposal of records created and maintained by UAL Awarding Body Approved Centres. It ensures consistency, transparency, and compliance with regulatory expectations, including data protection law, quality assurance, and learner rights.

1.2 Communication of the Policy

UAL Approved Centres must ensure that all staff involved in the management, delivery, assessment, and quality assurance of UAL Awarding Body qualifications are aware of, and comply with, this Retention Policy.

Centres must also inform learners, at enrolment, of the categories of data and assessment evidence that will be retained, the length of time records will be held, and how this supports post-results services such as appeals, complaints, and certification.

UAL Awarding Body will make this Policy available to all Approved Centres via our website and through external communications.

1.3 Scope

This Policy applies to all Approved Centres delivering UAL Awarding Body qualifications. It covers learner records, assessment documentation, centre administration records, and supporting evidence relating to the delivery, assessment, and award of qualifications.

The Policy must be read in conjunction with other UAL Awarding Body policies and procedures, which are available on our website.

Retention periods apply to all UAL Approved Centres. Unless otherwise specified, all durations are measured from the official release date of results for the full qualification, not from the completion of individual units or years. This ensures that all assessment evidence and records remain available throughout the learner's programme of study and for the required period after the final award is conferred.

1.4 Responsibilities

UAL Awarding Body is responsible for:

To ensure that retention requirements are clearly defined, consistently communicated, and compliant with both regulatory Conditions of

Recognition and Data Protection law (including the UK GDPR), we will:

- > Publish and maintain this Policy on our website and through external communications.
- > Monitor Approved Centres' compliance with the Policy through quality assurance processes, including external moderation and centre visits.
- > Provide guidance and clarification where centres have queries about retention periods or secure data handling.
- > Report to the qualifications regulators where any failure to meet retention requirements has, or may have, an Adverse Effect.
- > Ensure that all personal data processed or stored by UAL Awarding Body is handled in line with our Transparency Notice and data protection responsibilities.

UAL Approved Centres are responsible for:

- > Retaining all categories of records specified in this Policy for the required duration, calculated from the release date of results for the full qualification, unless otherwise stated.
- > Ensuring secure storage and restricted access to records during the retention period, in line with GDPR and data protection requirements.
- > Returning certificates and other learner-facing documents to UAL Awarding Body when instructed, or securely disposing of them in line with this Policy.
- > Informing learners, at enrolment, about what records will be retained, how long they will be kept, and how this supports processes such as appeals, complaints, and certification.
- > Providing UAL Awarding Body with access to retained records upon request for quality assurance, appeals, investigations, or regulatory compliance.

UAL Awarding Body reserves the right to request access to records at any time during the retention period, or after it has ended, for purposes including appeals, complaints, investigations, or monitoring compliance with regulatory requirements.

2. Retention Guidance

2.1 Note on Retention Periods

Unless otherwise specified, all durations stated in this Policy are measured from the official release date of results for the full qualification. This means that where a qualification spans multiple years (e.g., the UAL Level 3 Extended Diploma), the retention period applies from the point at which the learner completes and has received a result for the qualification in its entirety. Centres must therefore retain all associated evidence, including records generated in earlier years of study, until the retention period has elapsed following the final release of results.

2.2 Categories of Records

Student Work: Approved Centres must retain physical outputs of summative student work until the completion of moderation. Once moderation has been completed, digital records of summative work should be retained for at least six months following the official release of results. This ensures that any subsequent queries, appeals or verification requests can be managed effectively.

Assessment Feedback: Annotated feedback, assessment tracking sheets, and internal verification (IV) records must be retained for a minimum of two years. These records provide evidence of the marking and verification process and ensure transparency and fairness in the assessment process.

Appeals: Centres must retain learner statements, records of centre decisions, related communications, and the final appeal outcome for a period of two years. This ensures that full documentation is available should a case need to be reviewed by UAL Awarding Body or a regulatory authority.

Special Consideration: Applications for special consideration, together with supporting medical or welfare evidence and the records of decisions made, must be retained for two years. This requirement ensures that centres can demonstrate that decisions have been made fairly and in line with policy requirements.

Reasonable Adjustments: Records of adjustment logs, learner needs evidence, internal decisions, and UAL application forms must be kept for two years. These documents provide assurance that learners' needs were considered and adjustments applied appropriately.

Learning Support (LSA / SEND): Centres must retain records of learning support provided, SENCO involvement, and related evidence for two years. These records ensure that the provision of additional support can be demonstrated if reviewed by UAL or external regulators.

Complaints: All documentation related to complaints, including forms, evidence, investigation notes, and centre responses, must be retained for a period of three years. This timeframe provides a sufficient window for further review or external oversight if necessary.

Malpractice and Maladministration: Reports, witness statements, dated records, identifiers of learners and staff, and final outcome reports must be retained for three years. This ensures evidence is available to review serious issues and to demonstrate compliance with regulations.

Conflict of Interest: Centres must keep annual declarations, details of mitigation steps, and any communications with UAL relating to conflicts of interest for three years. These records demonstrate proactive management of conflicts and support ongoing compliance.

Certificates: Certificates must be retained securely for three months. Where learners fail to collect their certificates, or where certificates cannot be delivered due to incorrect addresses within this three month window, centres must immediately notify UAL Awarding Body. After this time, certificates must either be returned to UAL Awarding Body or destroyed securely with a record of deletion kept.

Category	Examples of Data to Record	Retention Period
Student Work	Summative work	Physical outputs: until moderation is complete. Digital records: 6 months from result release.
Assessment Feedback	Annotated feedback, assessment tracking sheets, Internal Verification (IV) records.	2 years
Appeals	Learner statements, centre decisions, communications, appeal outcome records.	2 years
Special Consideration	Learner applications, supporting medical/welfare evidence, decisions made.	2 years
Reasonable Adjustments	Adjustment logs, learners needs evidence, internal decisions, UAL application forms.	2 years
LSA / SEND Support	Records of support given, SENCO involvement, related evidence.	2 years
Complaints	Complaint forms, evidence, investigation notes, centre responses.	3 years
Malpractice & Maladministration	Reports, witness statements, dates, learner/staff identifiers, final outcome report.	3 years
Conflict of Interest	Annual declarations, mitigation steps, communications with UAL.	3 years
Certificates	Cases where certificates are not collected or cannot be posted due to incorrect addresses within a 3 month period from date of issue.	Notify UAL Awarding Body immediately and either securely destroy or return to UAL Awarding Body.

3. Data Protection and Equality

All records must be managed in line with the UK General Data Protection Regulation (GDPR) and UAL Awarding Body's Transparency (Privacy) Notice. Records must be retained securely and destroyed when no longer required, ensuring the protection of personal and sensitive information.

UAL Awarding Body believes that equality and diversity is integral to our inclusive curriculum, our creative innovation, our global reputation and the richness of UAL Awarding Body. We are committed to addressing inequality and celebrating diversity in order to sustain an accessible and inclusive environment for all learners, centres, governors, visitors, community and commercial partners with whom we engage. For more information about accessibility please review our accessibility statement.

4. Monitoring and Review

This Policy will be reviewed periodically to ensure compliance with regulatory requirements and best practice in records management. Approved Centres are required to review their internal procedures regularly to ensure alignment with this Policy.

5. Links to Regulatory Conditions

As an awarding body recognised by the UK qualifications regulators, we are required to comply with all Conditions of Recognition to ensure the qualifications we offer and award are fit for purpose, valid, accurate, and reliable. This Retention Policy aligns with and supports compliance with the relevant regulatory conditions.

6. Query Guidance



For general retention or GDPR queries please contact the UAL Awarding Body Information Compliance Team
infocompliance.awarding@arts.ac.uk

For retention of assessment records queries please contact the Academic Standard Team
academic.awarding@arts.ac.uk