

British Creative Institute

Staff Training, Certification, Course Funding and Repayment Policy

Including certificate control, permitted use, repayment agreement, leaver process, data protection and audit controls

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Version	1.0 - Draft for approval
Owner	Principal / Head of College with HR Lead
Approval authority	Board / Governing Body / Proprietor
Applies to	All British Creative Institute staff, including senior leaders, teachers, SEND staff, teaching assistants, reception/admin, management, contractors and agency staff where their contract permits.
Effective date	To be inserted on approval
Review date	12 months from approval or earlier if employment law, funding, Ofsted, data protection or operational requirements change
Linked documents	Staff Contract, Staff Handbook, CPD Policy, Data Protection Policy, IT Acceptable Use Policy, Confidentiality Policy, Safeguarding Policy, Safer Recruitment Policy, Leavers Procedure, Payroll Procedure
Important implementation note	
This policy is designed to be legally safer than a blanket statement that every certificate belongs to the College. BCI can own institutional certificates, course accounts, licences, records, materials and internal copies. A certificate issued personally to a staff member may also contain that worker's personal data and may be personal professional evidence. BCI should therefore control use, retain records and recover agreed costs through a signed agreement, rather than relying only on ownership wording. Final approval should be checked against BCI's staff contracts and payroll arrangements before use.	

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1. Purpose

The purpose of this policy is to make sure that training, qualifications, certificates, course accounts and professional development paid for by British Creative Institute (BCI) are requested, approved, used, recorded and recovered fairly, lawfully and consistently.

BCI funds staff training to improve the safety, quality, compliance and effectiveness of the College. Training may support teaching quality, SEND practice, safeguarding, health and safety, curriculum delivery, leadership, administration, reception, data protection, systems use, finance, facilities, behaviour support, learner welfare or any other operational area.

This policy protects BCI from avoidable loss where it has paid for training that is primarily for BCI business use, while also protecting staff from unclear, unfair, retrospective or unlawful repayment demands.

Success standard

Every funded course must have a clear business reason, a named owner, a signed approval record, a clear certificate/control rule, a data protection basis, a repayment position where applicable, evidence of completion and an audit trail.

2. Scope

This policy applies to:

- all employees and workers of BCI, whether permanent, temporary, full-time, part-time, fixed-term or casual;
- senior leaders, managers, teachers, tutors, SEND staff, teaching assistants, reception/admin staff, pastoral staff, attendance staff, support staff, finance, facilities and operational staff;
- contractors, consultants, volunteers, agency workers and self-employed workers where their written contract or engagement terms expressly apply this policy;
- training, certificates, qualifications, accreditations, CPD courses, external workshops, professional memberships, online course licences, exam fees, registration fees, provider accounts, course materials, subscriptions and renewal fees funded or reimbursed by BCI.

This policy does not apply to privately funded training paid for entirely by the staff member, unless BCI is asked to record it as evidence of competence for the staff member's role. If BCI records privately funded training, BCI may hold a copy for HR, safeguarding, quality or compliance purposes, but the course itself is not a BCI-funded asset.

3. Policy statement

BCI's policy is that training funded by the College must be used for the benefit of BCI learners, staff, systems and operations. Staff must not use BCI-funded training accounts, course materials, licences, certificates or resources for unauthorised personal business, competing work, external consultancy, another employer, private tutoring, commercial services or any activity outside BCI without written approval.

BCI may require repayment of the full actual cost or a proportion of the cost of training only where this is lawful, proportionate, transparent and agreed in writing before the training starts. BCI will not make payroll deductions for training unless the staff member's contract or a separate written agreement authorises the deduction, the amount is evidenced, and payroll has checked National Minimum Wage and other legal requirements.

Legal safety wording

BCI should use the phrase "full actual cost" rather than "penalty" or "fine". Full actual cost means the real amount paid or committed by BCI, evidenced by invoice, booking confirmation, examination fee, certificate fee, licence fee or provider charge. BCI must not charge more than it actually incurred unless a separate lawful contractual basis exists.

4. Legal and professional framework

This policy is intended to support compliance with the following areas. It is not a substitute for legal advice on a contested deduction, repayment dispute or individual employment matter.

Area	Requirement built into this policy
Employment Rights Act 1996 - unauthorised deductions from wages	No deduction from wages unless required by law, permitted by contract, an overpayment recovery, or agreed in writing beforehand. Training recovery must be supported by written authority.
National Minimum Wage / National Living Wage	Mandatory training cost deductions must not reduce pay below the applicable minimum wage. Voluntary training deductions require careful payroll review.
Written statement of employment particulars	Mandatory training and relevant training entitlements/costs should be reflected in contracts or written statements where applicable.
Contract law and penalty risk	Repayment must be a genuine recovery of actual, evidenced cost and not an excessive punishment or unreasonable restraint on future work.
UK GDPR and Data Protection Act 2018	Training records, certificates, attendance, assessments, platform data and repayment records are employment records/personal data and must be lawful, fair, transparent, secure, accurate, limited and retained only as needed.
Equality Act 2010 / reasonable adjustments	Training decisions must not discriminate. BCI must consider reasonable adjustments for disabled staff accessing training or assessment.
Copyright, licensing and confidentiality	BCI-funded course materials, logins, provider licences, internal training materials and institutional accounts must not be copied, shared or reused unlawfully.
Safeguarding and safer operation of a SEND college	Training records for safeguarding, SEND, health and safety, behaviour, online safety and learner welfare may be needed as evidence that staff are competent and safe to work with learners.

5. Definitions

Term	Meaning
BCI-funded training	Any course, qualification, certificate, CPD, registration, exam, licence, subscription, online platform access or professional development paid for or reimbursed by BCI.
Certificate	A document, digital badge, email confirmation, award, qualification statement, attendance certificate, competency record or provider-issued evidence showing completion, attendance, achievement or accreditation.
Institutional certificate	A certificate or accreditation issued to BCI, a BCI site, BCI as a provider, or a role holder only in their BCI capacity. This is BCI property.
Personal certificate	A certificate issued in the individual staff member's name. BCI may hold a copy as an employment/compliance record where necessary, but the staff member may have data protection and personal credential rights.
Training asset	Any course licence, account, login, materials, workbook, resource, recording, assessment, subscription or certificate funded by BCI.
Full actual cost	The documented amount BCI paid or is liable to pay, including course fee, assessment fee, certificate fee, exam fee, registration fee, licence fee, non-attendance fee, cancellation fee, duplicate certificate fee and agreed travel/accommodation where applicable.
Repayment agreement	A written agreement signed before training starts that explains the cost, repayment triggers, permitted deductions, recovery period, certificate control and dispute route.
Mandatory training	Training BCI requires the worker to complete because it is necessary for their role, safety, safeguarding, compliance or operation of the College.
Voluntary or portable training	Training that provides a qualification, certificate, licence or professional benefit that may be useful outside BCI as well as within BCI.

6. Core principles

Principle	Required control
Business need	BCI funds training because it supports safe, effective, compliant and high-quality work in the College.
Prior written approval	Training must be approved before booking. Repayment terms must be agreed before training starts.
Transparency	Staff must know the course cost, certificate rules, repayment triggers, deductions authority and data use before agreeing.
No retrospective enforcement	BCI must not apply repayment terms retrospectively to a course already completed unless the staff member freely signs a new agreement supported by consideration or separate legal advice.
Proportionality	Repayment must reflect actual cost and must not be a punishment, penalty or unreasonable restriction on future employment.
Data protection by design	Training records and certificates must be stored securely, accessed only by authorised staff and retained only for justified purposes.
Fairness and equality	Training decisions must be applied consistently and reasonable adjustments must be considered.
Auditability	Every funded training decision must be traceable through the training request, approval, agreement, completion evidence, certificate record and any repayment decision.

7. Training categories and repayment status

Category	Examples	Repayment position	Certificate/control position
A. Mandatory statutory or role-essential training	Safeguarding, Prevent, health and safety, first aid where required, data protection, safer recruitment, fire safety, online safety, SEND essentials.	Normally not recoverable unless the contract and written agreement lawfully permit recovery and payroll confirms no National Minimum Wage issue. Mandatory training deductions require high caution.	BCI keeps completion evidence in HR/compliance records. Personal copies may be provided where appropriate; institutional certificates remain BCI property.
B. BCI-specific systems, licences or internal training	MIS systems, CPOMS/admin systems, BCI internal curriculum/training, platform licences, college-specific software accounts.	Generally not recoverable as staff cannot take the BCI account/licence away. Recovery may apply if staff misuse, fail to return assets or breach licence terms and contract allows.	BCI owns accounts, licences, records and materials. Access ends when role ends.
C. Portable professional qualification/certificate	External certificates, teaching qualifications, assessor/verifier awards, specialist technical certifications, leadership qualifications.	Recoverable if signed before the course starts. Full actual cost or tapered cost may apply depending on the agreement.	Certificate issued to BCI remains BCI property. Certificate issued to staff may be copied into HR; repayment is separate from data access rights.
D. Staff-requested development	Optional courses requested by staff for career development but useful to BCI.	Recoverable if approved and agreed in writing. BCI may require repayment if the staff member leaves within the recovery period or requests personal release/transfer after leaving.	BCI records completion. Provider account/licence funded by BCI must not be transferred unless authorised.
E. Professional membership,	Professional body fees, safeguarding	Recoverable only if agreement states this. Annual subscriptions	Membership may be personal or institutional

registration, renewal or subscription	membership, educational platforms, software subscriptions.	may be pro-rated if staff leave during the membership year.	depending on provider rules. BCI-funded institutional membership remains BCI property.
F. Non-attendance, failure to complete or cancellation	Staff fails to attend, withdraws without good reason, misses exam, or causes cancellation charges.	Full actual cost may be recoverable if the failure was avoidable and not due to sickness, disability, emergency, BCI instruction or other reasonable cause.	HR records reason and evidence. Manager must consider fairness and equality before recovery.

8. Approval procedure

BCI must follow this procedure before funding or reimbursing a course, certificate or professional training asset.

1. Need identified: The line manager, staff member, DSL, SENDCO, Principal, HR Lead or Quality Lead identifies a training need linked to role, safeguarding, SEND, teaching quality, compliance, learner safety, professional competence or operational performance.
2. Training request completed: The staff member or manager completes the Training Request and Approval Form, including course provider, title, dates, cost, reason, expected impact, certificate type, training category and whether the training is mandatory or voluntary/portable.
3. Business case reviewed: The line manager confirms why the training is needed, how it supports the role, whether staff cover is required, and whether the same benefit can be achieved more proportionately.
4. Equality and access check completed: The manager asks whether reasonable adjustments are needed for the staff member to access or complete the course, including timing, accessibility, assessment method, assistive technology or communication support.
5. Data protection check completed: Where the provider collects staff data, uses an online platform, records sessions, issues digital badges or shares data externally, the manager/HR must check what data is shared, why, and whether BCI has an appropriate privacy notice or data sharing/processor arrangement.
6. Cost approval obtained: Finance and the authorised budget holder approve the full actual cost and confirm whether BCI will pay directly or reimburse on evidence.
7. Repayment decision made before booking: HR confirms whether repayment applies. If it applies, the staff member must sign the Training Authorisation and Repayment Agreement before BCI books or pays for the course.
8. Booking made: BCI books the course using a BCI email/account where possible. Staff must not book using personal accounts unless approved, because it can reduce control over certificates, records, licences and data.
9. Completion evidence recorded: After training, staff provide completion evidence, certificate, attendance record or provider confirmation to HR within five working days.
10. Impact reviewed: The line manager reviews whether the training improved practice, compliance, learner support, curriculum quality, safety or operational performance.

9. Certificate ownership, control and permitted use

BCI must use the following certificate control rules. These rules are designed to protect BCI while avoiding an unlawful or inaccurate claim that BCI owns a person's knowledge, personal professional identity or data protection rights.

Certificate / asset type	Control rule
Certificate issued to BCI or to a BCI site	This is BCI property. The original certificate, provider login, renewal record and related evidence must be held centrally by HR or the relevant compliance lead.
Certificate issued to a role holder in their BCI capacity	This is controlled by BCI while the person holds the role. If the person leaves or changes role, BCI may appoint another role holder and retain the institutional record.

Certificate issued personally to a staff member	BCI may require a copy for HR, quality, safeguarding or compliance evidence. BCI should not permanently retain a personal original unless provider rules or a clear documented need justify this. Cost recovery must be handled through the repayment agreement, not by unlawfully withholding personal data.
Course account, online licence, institutional subscription or platform access	BCI owns the account/licence if BCI paid for it or it is registered to BCI. Staff must not change passwords, transfer accounts, download content unlawfully or continue using access after leaving.
Course materials, workbooks, recordings and digital resources	Provider copyright and licence terms apply. BCI-funded materials must be used only for BCI work unless written permission is given by BCI and the provider licence permits it.
Internal BCI training materials	BCI owns internally created materials unless otherwise agreed. Staff must not copy, share, sell, publish or use them outside BCI without written approval.
Permitted use rule	
BCI-funded training is provided for BCI operational use. Staff may use the knowledge and professional competence they gain in their work, but they must not use BCI-paid accounts, licences, materials, templates, internal documents, learner data, safeguarding information, business information, branding or confidential know-how outside BCI without written permission.	

10. Staff obligations during and after training

Staff who receive BCI-funded training must:

- attend all sessions, complete assessments and meet provider deadlines unless there is a reasonable reason for absence or adjustment;
- use BCI-funded training for their BCI role and the benefit of BCI learners, systems and operations;
- provide BCI with copies of certificates, completion records, assessment results and relevant renewal dates;
- not share provider accounts, passwords, course materials, recordings or downloadable resources unless permitted by licence;
- not claim BCI endorsement, authority or employment status after leaving;
- not use BCI training assets to provide external commercial services, competing services or private tuition without written permission;
- tell HR promptly if they cannot complete the training, fail an assessment, miss a session, need an adjustment, or receive a certificate directly;
- repay recoverable costs where the repayment agreement applies and a repayment trigger occurs.

11. Repayment and deduction procedure

Repayment must be handled lawfully, proportionately and with a clear audit trail. BCI must not make deductions simply because a manager believes the College paid for a course. The following steps apply to every repayment decision.

11. Check written authority: HR confirms that the staff member signed a Training Authorisation and Repayment Agreement before the course started, or that the employment contract/staff handbook contains an enforceable written deduction clause that clearly covers the training.
12. Check the trigger: HR identifies the repayment trigger, such as resignation within the recovery period, dismissal for conduct, failure to attend/complete without reasonable cause, breach of licence/permitted use, or request to transfer/release a BCI-funded certificate/account for personal use after leaving.
13. Calculate full actual cost: Finance provides evidence of the real cost paid or committed by BCI. The calculation must not exceed the invoice/provider cost unless a separate lawful agreement covers additional costs.
14. Apply the repayment table: HR applies the repayment schedule in the signed agreement. Where no schedule is stated, BCI should use the default schedule below unless legal advice approves a different position.

15. Check exemptions and fairness: HR checks whether the reason relates to redundancy, ill health, disability, pregnancy, family leave, course cancellation, BCI withdrawal, provider failure, reasonable adjustment issues or another factor making recovery unfair or unlawful.
16. Notify staff in writing: HR gives the staff member the calculation, evidence, proposed deduction or invoice method, date, right to query, and contact point.
17. Payroll and National Minimum Wage check: Payroll checks whether deduction is lawful and whether it would create minimum wage issues, especially for mandatory training. Where there is risk, HR must pause and obtain advice.
18. Allow response: Staff must be given a reasonable opportunity to challenge the calculation or raise mitigating factors before deduction or invoice unless immediate recovery is clearly authorised and lawful.
19. Make deduction or invoice: If recovery proceeds, it must be made only through authorised payroll deduction, final pay deduction, agreed repayment plan or invoice.
20. Record the outcome: HR stores the calculation, authority, staff response, payroll check, decision and outcome in the training repayment record.

Default recovery period	Amount repayable
Before completion, non-completion or avoidable cancellation	100% of full actual cost, unless a fairness exemption applies.
Leaving or transfer request within 0-6 months after completion	100% of full actual cost.
Leaving or transfer request within 7-12 months after completion	75% of full actual cost.
Leaving or transfer request within 13-18 months after completion	50% of full actual cost.
Leaving or transfer request within 19-24 months after completion	25% of full actual cost.
After 24 months	0%, unless a separate licence, subscription, duplicate certificate fee or provider charge remains payable.
Full price requested after leaving	
If a former staff member asks BCI to release an original institutional certificate, transfer a BCI-paid account, request a duplicate certificate, or provide certificate evidence for personal use outside BCI, BCI may require payment of the full outstanding recoverable amount under the signed agreement and any provider duplicate/administration fee. This must not restrict statutory data protection rights, subject access rights or rights to information the awarding body provides directly to the individual.	

12. Leaver process

The leaver process must protect BCI assets, comply with payroll rules and avoid unlawful deductions.

21. HR checks the Training and Certificate Register when a resignation, dismissal, contract end, transfer or role change is received.
22. HR identifies any live repayment agreements, certificates, licences, subscriptions, professional memberships, provider accounts, exam bookings, renewals or training assets.
23. The line manager confirms whether the training benefit has been delivered, whether any course remains incomplete, and whether BCI still requires evidence for compliance.
24. IT disables BCI-funded course accounts, platform access, software licences and shared drives unless business continuity requires temporary controlled access.
25. Finance confirms costs paid and any outstanding provider liabilities.
26. HR calculates any repayment using the signed agreement and prepares a written leaver training statement.
27. Payroll checks deduction authority and minimum wage impact before any final pay deduction.
28. If a deduction cannot lawfully be made or final pay is insufficient, HR may issue an invoice or agree a repayment plan where contractually permitted.
29. BCI provides copies of personal data or personal certificates in line with data protection rights and does not use data access rights as leverage for payment.
30. Leaver checklist is signed off by HR, Finance, line manager and IT.

13. Data protection and confidentiality controls

Training records and certificates are employment records and may include personal data. Some records may also include special category data, for example disability-related adjustments for accessing training. BCI must process this information lawfully, fairly and transparently.

Control area	BCI requirement
Lawful basis	BCI will normally rely on contract, legal obligation and/or legitimate interests for training records, depending on the purpose. Consent should not normally be relied on for core employment records because of the imbalance of power in employment.
Privacy notice	BCI must tell staff what training/certificate data is collected, why it is used, who it is shared with, how long it is kept and what rights staff have.
Data minimisation	BCI must keep only what is needed: request, approval, agreement, cost, provider, certificate, completion result, expiry/renewal date, role relevance, repayment record and audit evidence.
Special category data	Disability, health or reasonable adjustment information must be kept only where necessary and with restricted access. It should not be placed on general registers unless strictly necessary.
Security	Training records must be stored in HR/controlled systems with role-based access. Copies should not be kept in personal email inboxes, unmanaged drives or local devices.
External providers	Only necessary staff data should be shared with training providers. Where providers process data for BCI, BCI must ensure appropriate contractual/data protection arrangements.
Retention	Training records should normally be kept for the duration of employment plus six years unless a shorter or longer period is justified by safeguarding, health and safety, regulatory, insurance or legal claim requirements. Records must be reviewed and securely deleted when no longer needed.
Subject access	Staff and former staff may have the right to request their personal data. BCI must not refuse personal data access solely because a repayment dispute exists.
Confidentiality	Staff must not upload learner data, safeguarding information, staff data or confidential BCI information to external training platforms unless approved and necessary.
Breach reporting	Any loss, unauthorised access or incorrect sharing of training/certificate data must be reported under BCI's Data Protection Breach Procedure.

14. Equality, reasonable adjustments and fairness

BCI must make training decisions fairly and must not discriminate against staff because of protected characteristics, disability, part-time status, pregnancy, family leave, age, race, religion or belief, sex, sexual orientation, gender reassignment, marriage/civil partnership or any other protected or relevant status.

- Managers must consider reasonable adjustments where a disabled staff member may be disadvantaged in accessing training, assessments, online platforms, travel, timed tests, written tasks or practical demonstrations.
- Repayment must not be triggered automatically where failure to attend or complete is connected to disability, ill health, emergency, pregnancy, maternity, caring responsibility, bereavement or another reasonable cause.
- Training opportunities must be allocated using role need, learner safety, curriculum quality, regulatory requirement, performance need and development priority, not personal preference or favouritism.
- Part-time staff must not be treated less favourably unless there is an objective business reason.
- Staff may raise a grievance or appeal if they believe a training, certificate or repayment decision is unfair, discriminatory or inconsistent.

15. Quality assurance, monitoring and audit

The HR Lead must maintain a Training and Certificate Register. The register should allow BCI to evidence staff competence, certificate expiry, training investment, repayment agreements, leaver risks and compliance with this policy.

Audit question		Evidence required	
Was training approved before booking?		Training request form, approval signature/date, budget code.	
Was repayment agreed before the course started?		Signed Training Authorisation and Repayment Agreement with cost and deduction wording.	
Is the certificate recorded?		Copy certificate, provider confirmation, expiry/renewal date, storage location.	
Was data shared lawfully with the provider?		Privacy notice, provider terms, processor/data sharing check where needed.	
Was impact reviewed?		Manager review, performance improvement, learner safety benefit, quality assurance note or CPD reflection.	
Were deductions lawful?		Written authority, calculation, invoice evidence, payroll/NMW check, staff notification.	
Are records secure and retained correctly?		Access controls, retention schedule, deletion/review log.	
Are decisions fair and consistent?		Sample audit by role, department, protected characteristics where appropriate, reason for approval/refusal.	
Monitoring item	Frequency	Owner	Report to
Training and certificate register review	Monthly during launch, then termly	HR Lead	Principal
Mandatory compliance certificate expiry review	Monthly	HR Lead / Compliance Lead	Principal / DSL / H&S Lead as applicable
Repayment agreement audit	Termly	HR Lead and Finance	Principal
Data protection sample audit	Termly	Data Protection Lead	Senior Leadership Team
Training impact review	Termly	Line Managers	Quality Lead
Board/governance report	Termly	Principal	Board / Governing Body
Full policy review	Annually	HR Lead	Board / Governing Body

16. Roles and responsibilities

Role	Responsibilities
Board / Governing Body / Proprietor	Approve the policy, challenge training spend and repayment fairness, review audit reports, ensure employment and data protection compliance.
Principal / Head of College	Own implementation, approve strategic training, authorise exceptions, ensure policy is linked to staffing, safeguarding, SEND and quality priorities.
HR Lead	Maintain training register, issue agreements, store certificates, advise on repayment, manage leaver checks, support data protection and equality controls.
Finance / Payroll	Verify costs, budget approval, invoices, payroll deduction authority, minimum wage checks and repayment collection.
Line Managers	Identify training needs, check business benefit, support completion, review impact and enforce permitted use.
Data Protection Lead / DPO where appointed	Advise on privacy notices, provider data sharing, SARs, retention, access controls and breaches.
Staff	Read and follow the policy, use training for BCI purposes, attend/complete courses, provide certificates, protect accounts/materials and repay costs where agreed.
IT Lead	Control BCI-funded course accounts, software licences, credentials and

	leaver access removal.
Training Providers	Provide clear terms, cost, data handling information, certificates, expiry dates and licence rules.

17. Breach of policy

A breach of this policy may be treated as a conduct, capability, contractual, data protection, confidentiality or financial matter depending on the seriousness and facts. Examples include:

- using BCI-funded training resources for personal business, another employer or a competing service without approval;
- sharing passwords, course materials, certificates, learner information or BCI confidential information unlawfully;
- refusing to provide completion evidence or certificate copies needed for compliance;
- falsifying completion evidence, certificates, attendance records or assessment results;
- failing to attend or complete training without reasonable cause after BCI has incurred cost;
- attempting to transfer a BCI account/licence/certificate without permission;
- making or authorising an unlawful deduction from wages.

BCI must investigate alleged breaches fairly under the relevant staff procedure. Repayment and discipline are separate matters: a disciplinary sanction does not automatically create a lawful right to deduct wages unless written deduction authority exists.

18. Review, governance and reporting

This policy must be reviewed at least annually and earlier if there is a change in law, ACAS guidance, HMRC minimum wage guidance, ICO guidance, BCI contracts, course funding model, Ofsted/SEND compliance requirements, safeguarding expectations or organisational structure.

- Termly training report to leadership: mandatory compliance rates, expiry risks, training spend, open certificates, outstanding evidence and planned training.
- Termly governance report: key risks, repayment disputes, data protection issues, equality/fairness concerns, significant training spend and audit findings.
- Annual review: policy effectiveness, staff feedback, disputes, deductions, provider quality, compliance gaps and cost recovery outcomes.

19. Implementation checklist

Action	Owner	Due date	Completed / evidence
Approve policy through Board/Governing Body/Proprietor.	Principal		
Review staff contracts and staff handbook to include training repayment and deduction clause.	HR / Employment solicitor		
Create Training and Certificate Register.	HR		
Create template Training Authorisation and Repayment Agreement.	HR		
Update staff privacy notice to include training records and certificates.	Data Protection Lead		
Train managers on approval process and deduction restrictions.	HR		
Notify all staff of new policy and effective date.	Principal / HR		
Audit existing certificates and training	HR / Managers		

assets.			
Separate existing training without prior agreement from new recoverable training.	HR		
Set monthly certificate expiry and leaver checks.	HR / Finance / IT		

20. Sign-off

Role	Name	Signature	Date
Policy owner			
Principal / Head of College			
HR Lead			
Data Protection Lead / DPO			
Finance / Payroll Lead			
Board / Governing Body / Proprietor approval			

Appendix A: Training request and approval form

Field	Response
Staff name / role / department	
Line manager	
Course / qualification / certificate title	
Provider / awarding body	
Course dates / assessment dates	
Mandatory, BCI-specific, portable or discretionary?	
Business reason for BCI funding	
How this supports BCI learners, safety, SEND, quality, leadership or operations	
Full actual cost and budget code	
Will BCI pay directly or reimburse?	
Will a certificate be issued? To whom?	
Does a repayment agreement apply?	
Are reasonable adjustments needed?	
What personal data will be shared with provider?	
Manager recommendation	
Finance approval	
Principal/authorised approval	

Appendix B: Training authorisation and repayment agreement

This agreement must be completed and signed before BCI books or pays for recoverable training.

Agreement field	Details
Staff member name	
Role / department	
Training / certificate title	
Provider / awarding body	
Course start and end date	
Full actual cost paid or committed by BCI	
Costs included	Course fee / exam fee / certificate fee / registration / licence / subscription / travel / accommodation / other
Training category	Mandatory / BCI-specific / portable professional / staff-requested / subscription / other
Repayment applies?	Yes / No
Repayment period	0-24 months from completion unless varied below
Certificate/account ownership rule	Institutional BCI certificate / personal staff certificate with BCI copy / BCI account or licence / other
Permitted use	For BCI work only unless written approval is given.
Deduction authority	I authorise BCI to deduct any recoverable training cost from salary, final pay, holiday pay or other wages where lawful and where the amount is due under this agreement. BCI will provide a calculation and check legal/payroll limits before deduction.
Repayment trigger	Leaving within repayment period / failure to complete / avoidable non-attendance / misconduct dismissal / unauthorised transfer or personal release / breach of licence or permitted use / other
Repayment schedule	100% before completion or 0-6 months; 75% 7-12 months; 50% 13-18 months; 25% 19-24 months; 0% after 24 months unless provider/duplicate/licence costs remain payable.
Exceptions	Redundancy, course cancellation by BCI/provider, ill health, disability, pregnancy/family leave, emergency, reasonable adjustment failure or other reason approved by HR/Principal.

Staff declaration	I have read the policy, understand the cost, understand the repayment triggers, understand the certificate/control rules, and have had the chance to ask questions before signing.
Staff signature / date	
Manager signature / date	
HR signature / date	
Finance signature / date	

Appendix C: Certificate release or copy request form

Field	Response
Requester name	
Current staff / former staff / manager / external verifier	
Certificate requested	
Is certificate institutional or personal?	
Purpose of request	
Does request involve personal data?	
Does a repayment agreement apply?	
Outstanding recoverable amount	
Provider duplicate/admin fee	
Data protection check completed?	
Approved copy / certified copy / original release / refusal reason	
Authorised by HR / Principal	
Date released / method of release	

Appendix D: Training and certificate register fields

- Staff name
- Role
- Department
- Line manager
- Course title
- Provider/awarding body
- Training category
- Mandatory or voluntary/portable
- Approval date
- Course start/end date
- Full actual cost
- Budget code
- Payment method
- Repayment agreement signed?
- Certificate issued?
- Certificate issued to whom?
- Certificate expiry/renewal date
- Storage location
- Data sharing check completed?
- Reasonable adjustments considered?
- Completion status
- Impact review date
- Leaver repayment risk

- Outstanding amount
- Repayment decision
- Payroll check completed?
- Notes/action owner

Appendix E: Leaver checklist

Check	Yes / No / N/A	Evidence / action
Training register checked		
Live repayment agreements identified		
Certificates and expiry records checked		
Course accounts/licences disabled or transferred internally		
Course materials returned/deleted where required		
Cost calculation completed by Finance		
Deduction authority checked by HR		
National Minimum Wage/payroll check completed		
Staff notified of proposed recovery		
Staff response/mitigation considered		
Deduction/invoice/repayment plan completed		
Personal data/certificate copy request handled separately from repayment dispute		
Final HR sign-off completed		

Appendix F: Model contract/handbook clause

Use only after legal/HR review

This clause should be reviewed against BCI's contracts and staff handbook before issue. It should not be inserted retrospectively without proper consultation and agreement.

Model clause:

Where British Creative Institute funds or reimburses training, qualifications, certificates, course accounts, licences, subscriptions or professional development for the employee/worker, the employee/worker agrees to comply with the Staff Training, Certification, Course Funding and Repayment Policy. Where a separate Training Authorisation and Repayment Agreement is signed before the training starts, the employee/worker authorises British Creative Institute to recover any repayable full actual cost in accordance with that agreement, including by deduction from wages or final pay where lawful. British Creative Institute will not deduct more than the recoverable amount evidenced by its records and will comply with applicable wage deduction, National Minimum Wage and data protection requirements. BCI-funded accounts, licences, institutional certificates, internal training materials and provider resources must be used only for BCI purposes unless written permission is given.

Appendix G: Source references

Official and authoritative references checked when drafting this policy:

Reference	URL
ACAS - Deductions for training courses when someone leaves	https://www.acas.org.uk/final-pay-when-someone-leaves-a-job/deductions-for-training-courses
ACAS - Deductions from pay and wages	https://www.acas.org.uk/deductions-from-pay-and-wages
ACAS - Getting paid for mandatory training	https://www.acas.org.uk/getting-paid-for-mandatory-training

GOV.UK - Written statement of employment particulars	https://www.gov.uk/employment-contracts-and-conditions/written-statement-of-employment-particulars
HMRC National Minimum Wage Manual - Training costs	https://www.gov.uk/hmrc-internal-manuals/national-minimum-wage-manual/nmwm11215
ICO - Employment practices and data protection: keeping employment records	https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/employment/employment-practices-and-data-protection-keeping-employment-records/
GOV.UK - Reasonable adjustments for disabled workers	https://www.gov.uk/reasonable-adjustments-for-disabled-workers
Legislation.gov.uk - Employment Rights Act 1996, section 13	https://www.legislation.gov.uk/ukpga/1996/18/section/13
Legislation.gov.uk - Equality Act 2010	https://www.legislation.gov.uk/ukpga/2010/15/contents