STAFFPOWER GROUP

RECRUITMENT & TRAINING

PICS Policy

| Version 2.0 |

Policy Commencement Date	20/08/2026
Policy Version	2.0
Review by	20/8/2027
Document Controller	Jonathan Hall
Signature	*J.Hall*

Contents page

Content	Page
1. Introduction	2
2. Scope	2
3. How Staff Power Training Uses PICS	2
4. Roles and Responsibilities	2
5. System Access and Security	3
6. Source Evidence and Data Entry Standards	3
7. Timeliness of PICS Updates	3
8. Data Quality and Validation	4
9. ILR Submission and Reconciliation	4
10. Third-Party and Subcontracted Data	4
11. Data Protection, Privacy and Retention	5
12. Training and Support	5
13. Audit Trail and Record Integrity	5
14. Non-Compliance	5
15. Policy Review	6

1. Purpose

This policy sets out Staff Power Training's requirements for the secure, accurate and timely use of PICS to create and maintain learner records and produce Individual Learner Record (ILR) data. It supports accurate funding claims, regulatory compliance, reliable management information and a clear audit trail from learner enrolment through to completion and outcome reporting.

2. Scope

This policy applies to all Staff Power Training employees, contractors and authorised users who collect, check, enter, amend, review or submit learner information through PICS. It covers prime and subcontracted provision, including Adult Skills Fund (ASF), Skills Bootcamps and other funded provision where PICS is used to maintain the learner record or generate ILR data.

3. How Staff Power Training Uses PICS

PICS is Staff Power Training's core learner management and ILR system. It is used alongside the organisation's wider operational and compliance processes to maintain the formal learner record.

- Create learner records following enrolment and eligibility checks.
- Record learner personal details, contact information and prior attainment.
- Record programme, learning aim, qualification, start date, planned end date and actual end date information.
- Record funding and eligibility information required for the relevant funding stream.
- Maintain learning status, completion, withdrawal and achievement information.
- Record employment status and other ILR fields required by current funding and ILR specifications.
- Generate and validate ILR data before submission.
- Support reconciliation of PICS records against enrolment paperwork, delivery records, awarding-body evidence and funding-body requirements.
- Support internal reporting, data-quality checks, audit preparation and funding reconciliation.

Where other systems are used operationally, PICS remains the principal system for the ILR learner record. Information held elsewhere must not be treated as a substitute for ensuring that the corresponding PICS/ILR record is accurate, complete and supported by evidence.

4. Roles and Responsibilities

- Operations and Compliance leadership: maintain oversight of ILR compliance, submission readiness, data quality and implementation of this policy.
- Training Coordinators / Compliance Officers / authorised administrators: enter and maintain learner information accurately and promptly, using approved source evidence.

- Data Lead / designated ILR lead: complete validation, investigate errors and warnings, prepare ILR returns and ensure submission deadlines are met.
- Managers: ensure relevant staff are trained, access is appropriate and data-quality actions are completed.
- Tutors and delivery staff: provide accurate and timely attendance, progress, completion, achievement and learner-change information to the relevant operational or compliance team.
- All users: protect learner data, use only their own authorised account and report suspected errors or security incidents promptly.

5. System Access and Security

- Access to PICS must be role-based and limited to authorised personnel.
- Users must use individual credentials and must not share passwords or accounts.
- Access permissions must be reviewed when responsibilities change and removed promptly when access is no longer required.
- Users must follow Staff Power Training's IT, information-security and data-protection requirements.
- Learner information must not be downloaded, exported, emailed or shared unless there is a legitimate business purpose and an appropriate secure method is used.
- Any suspected unauthorised access, data loss or security breach must be reported immediately through Staff Power Training's incident-reporting arrangements.

6. Source Evidence and Data Entry Standards

PICS entries must be based on appropriate source evidence. Staff must not guess, assume or create information simply to complete a mandatory field.

- Learner identity, residency, eligibility and funding evidence must be checked in accordance with the applicable funding rules and Staff Power Training procedures.
- Learner details must match approved enrolment documentation and evidence. Differences must be investigated before the ILR is finalised.
- Learning aims and funding information must reflect the programme actually being delivered and the applicable funding arrangement.
- Start, completion, withdrawal and achievement dates must be supported by evidence and must reflect what actually occurred.
- Where a learner's circumstances or programme changes, PICS must be updated as soon as the change is confirmed.
- Mandatory fields must be complete before the learner record is treated as submission-ready.

7. Timeliness of PICS Updates

New learner records should be entered into PICS at the earliest practical opportunity following enrolment and eligibility checking. Staff Power Training's expectation is that records are maintained throughout the learner journey rather than being updated only immediately before an ILR return.

- New starts must be processed promptly so that data can be checked before the relevant ILR submission.
- Withdrawals, breaks, completions, achievements and other material changes must be communicated and updated without unnecessary delay.
- Where PICS or the ILR is temporarily locked for validation or submission, new information must be securely retained and entered as soon as the system is reopened.
- Backdating or retrospective amendments must only be made where supported by evidence and must not be used to manipulate funding or performance information.

8. Data Quality and Validation

Data quality is a shared responsibility. PICS data must be routinely checked against supporting documentation and operational records.

- PICS validation reports, ILR errors and warnings must be reviewed before submission.
- Errors must be corrected at source wherever possible, with the supporting evidence retained.
- High-risk or material fields should be subject to additional review, including learner eligibility, funding model, learning aims, dates, completion status and achievement information.
- Internal sampling and reconciliation should be used to identify recurring issues and inform staff training or process improvements.
- Data-quality findings and corrective actions should be retained to provide an audit trail.

9. ILR Submission and Reconciliation

PICS will be used to generate the ILR data required for Staff Power Training's funded provision. The designated ILR/Data Lead and Compliance management will oversee the review and submission process.

- Returns must be prepared and submitted in line with the current ILR timetable and applicable funding-body requirements.
- Validation errors must be investigated and resolved before final submission wherever possible.
- Submitted values should be reconciled to PICS and relevant internal records so that material differences can be identified and investigated.
- Where a funding body or subcontracting partner requires separate portals, trackers or returns, the information submitted must be consistent with the underlying learner evidence and PICS record.
- Any post-submission correction must be supported by evidence and processed through the appropriate correction process.

10. Third-Party and Subcontracted Data

Staff Power Training may receive learner information from employers, subcontracting partners, colleges, funding bodies or other authorised organisations. Such information must be handled to the same standards as information collected directly.

- Information must be verified before it is used to create or amend a PICS record.
- Data-sharing arrangements must have an appropriate lawful basis and comply with applicable data-protection requirements.
- Discrepancies must be resolved with the relevant party rather than silently amended without evidence.
- Access to third-party learner information must be restricted to staff who require it for their role.

11. Data Protection, Privacy and Retention

Personal data processed through PICS must be handled in accordance with the UK GDPR, Data Protection Act 2018, Staff Power Training's privacy and data-protection policies, applicable funding rules and contractual retention requirements.

- Only information necessary for a legitimate and documented purpose should be processed.
- Learner information must be accurate and kept up to date.
- Personal data must not be disclosed to unauthorised individuals or organisations.
- Records and exports must be retained and securely disposed of in accordance with Staff Power Training's retention arrangements and relevant funding requirements.
- Requests relating to personal data must be referred to the appropriate responsible person within Staff Power Training.

12. Training and Support

- New PICS users must receive role-appropriate training before independently creating or amending learner records.
- Refresher training must be provided when significant ILR, funding-rule, system or internal-process changes occur.
- Staff must use current internal guidance and escalate uncertainties rather than making unsupported assumptions.
- Recurring errors identified through validation, audit or sampling should be used to target additional training.

13. Audit Trail and Record Integrity

- Users must make amendments in a way that preserves an appropriate audit trail.
- Evidence supporting material learner-record changes must be retained in the approved location.
- Records must not be altered, deleted or backdated to conceal an error or create an unsupported funding claim.
- Where an error is identified after submission, it must be escalated and corrected through the appropriate ILR or funding-body process.

14. Non-Compliance

Failure to follow this policy may result in inaccurate ILR data, delayed or reduced funding, recovery of funding, audit findings, contractual non-compliance, data-

protection breaches or reputational damage. Deliberate falsification or misuse of learner data may be treated as a disciplinary matter in accordance with Staff Power Training procedures.

15. Policy Review

This policy will be reviewed at least annually and sooner where there is a material change to PICS, the ILR specification, funding rules, Staff Power Training's delivery model or regulatory requirements. The next scheduled review date is 18 August 2027.