

Candidate Records Keeping Policy

Quick reference (one-page process)

This section is designed as the day-to-day workflow for a solo operator.

What to save (minimum)

- **Register/attendance:** candidate name + course title/date + employer/client (if applicable) + trainer name
- **Outcome:** completed / not completed (and brief reason if not completed)
- **Assessment evidence (if applicable):** completed checklist/competency sign-off
- **Certificate details (if applicable):** certificate identifier/registration details and issue date
- **Adjustments (only if needed):** brief note of agreed reasonable adjustments (avoid detailed medical information)

Where to save it (one place)

- Save all course records in **one secure folder location** (e.g., Google Drive) using a consistent structure:
 - **Year → Client (or Open Courses) → Course Date + Course Title → Records**
- Avoid storing the “only copy” of key evidence in email threads.

When to save it

- **Same day (ideal):** register + assessment evidence
- **Within 2 working days:** certificate details added and file set marked complete

Who can access it

- Default access: **Director/Lead Educator only**
- Share access only where necessary for delivery/assessment/quality assurance.

How long to keep it

- Default retention: **6 years from the course date** (unless law/contract/insurer/external rules require longer)

When to delete it

- At the end of the retention period: **securely delete/destroy** records (and keep a minimal deletion log if practical)

1. Policy statement

Safe Skills Training Ltd is committed to keeping accurate, secure, and proportionate records for candidates (learners) who attend our training. We will only collect and retain information that is necessary for legitimate training, quality assurance, certification/verification, safeguarding, legal, and business purposes.

We will handle candidate records in line with UK GDPR and the Data Protection Act 2018, and we will make record-keeping as simple and workable as possible for a small training provider.

2. Scope

This policy applies to:

- All candidates/learners attending Safe Skills Training Ltd training (open courses and on-site client courses)
- All formats of records (paper, email, digital forms, spreadsheets, learning materials, photos/videos where used)
- All staff/associates who may handle candidate information (including subcontractors where applicable)

This policy covers candidate records. It does not replace other policies such as Data Protection, Safeguarding, Complaints, Appeals, or Malpractice/Maladministration.

3. Definitions

- **Candidate record:** Any information that identifies (or could identify) a candidate and relates to their training, assessment, or certification.
- **Personal data:** Information relating to an identifiable person.
- **Special category data:** More sensitive data (e.g., health information, disability/adjustments, ethnicity) requiring extra protection.
- **Processing:** Any action taken with data (collecting, storing, sharing, deleting, etc.).

4. Principles (what we commit to)

We will keep candidate records in a way that is:

- **Lawful, fair and transparent**
- **Purpose-limited** (used only for clear training/admin purposes)
- **Data-minimised** (only what we need)
- **Accurate and up to date**
- **Storage-limited** (kept only as long as needed)
- **Secure** (protected against loss, misuse, or unauthorised access)

- **Accountable** (we can explain what we hold and why)

5. What records we keep (minimum set)

To keep the process simple, our default approach is to keep a **minimum viable record set**:

5.1 Core training/admin records

- Candidate name
- Employer/client (where applicable)
- Course title and date
- Attendance confirmation
- Trainer name
- Outcome (e.g., completed / not completed)
- Certificate identifier/details (where applicable)

5.2 Assessment/competency evidence (where applicable)

- Assessment checklists or competency sign-off
- Reasonable adjustment notes (if relevant)
- Incident notes relating to assessment integrity or safety (if relevant)

5.3 Optional records (only where needed)

- Contact details (email/phone) for open courses or where the candidate must receive documents directly
- Feedback forms (preferably anonymised unless identification is needed for follow-up)

6. Special category data and reasonable adjustments

Where a candidate discloses information relating to health, disability, or other special category data:

- We will only record what is necessary to support safe participation and fair access
- We will keep it separate where practical (e.g., a restricted “adjustments” section)
- We will limit access to those who need to know
- We will avoid recording detailed medical information unless essential

7. How we collect records (simple-by-design workflow)

To reduce admin burden, Safe Skills Training Ltd will use a **standardised workflow** wherever possible:

1. **Pre-course (if needed):** Candidate list provided by the client/employer (name + role only, unless more is required)
2. **On the day:** Attendance captured once (single register) and assessment evidence completed only where required
3. **Post-course:** Certificates issued/verified and records saved in one place

We will avoid duplicating the same information across multiple systems.

8. Storage and security

8.1 Digital records (preferred)

- Stored in secure, access-controlled systems (e.g., Google Drive)
- Protected with strong passwords and multi-factor authentication (MFA) where available
- Organised using consistent file naming so records can be found quickly

8.2 Paper records (where unavoidable)

- Kept to a minimum
- Stored securely (locked storage) and transported carefully
- Scanned and moved to digital storage as soon as practical
- Paper originals securely destroyed when no longer required

8.3 Email

- Candidate personal data should not be stored long-term in email threads where avoidable
- Key evidence should be saved to the candidate record location, not left only in inboxes

9. Access control (who can see what)

Access to candidate records will be limited to:

- Director/Lead Educator
- Trainers/assessors only where necessary for delivery/assessment
- Quality assurance roles where required

We will not share candidate records with clients/employers except where:

- The candidate has been sponsored by the employer and the information is needed for training records/compliance, and/or
- There is a lawful basis to do so

10. Sharing with external parties

Where training involves external certification/verification processes or external quality assurance:

- We will share only the minimum necessary information
- We will share through secure methods
- We will keep a record of what was shared, when, and why

11. Retention (how long we keep records)

We will retain candidate records for a period that is:

- Long enough to respond to verification requests, quality assurance, complaints/appeals, and legal queries
- Not longer than necessary

Default retention period: Candidate training and assessment records will normally be retained for **6 years** from the course date, unless:

- A longer period is required by law, contract, insurer, or external certification rules, or
- A shorter period is appropriate for certain low-risk records (e.g., anonymised feedback)

At the end of the retention period, records will be securely deleted/destroyed.

12. Candidate rights and requests

Candidates have rights under data protection law, including the right to:

- Request access to their personal data
- Request correction of inaccurate data
- Request deletion (where applicable)
- Object to or restrict certain processing (where applicable)

Requests should be made to:

- andy@safeskillstraining.com

We may need to verify identity before releasing information.

13. Data breaches and incidents

If we suspect a data breach (loss, theft, unauthorised access, or accidental disclosure):

- We will act immediately to contain the breach
- We will assess risk to individuals
- We will record the incident and actions taken
- Where required, we will report to the relevant authority and/or affected individuals within required timescales

14. Quality assurance and audit trail

We will maintain an audit trail sufficient to demonstrate:

- Who delivered training
- Who assessed (where applicable)
- What evidence supports the outcome
- That records are authentic and have not been altered improperly

15. Responsibilities

- **Director/Lead Educator:** Overall responsibility for candidate records, security, retention, and responding to requests
- **Trainers/Assessors:** Responsible for accurate completion of registers and assessment evidence and secure handover
- **Any subcontractors (if used):** Must follow this policy and any agreed data handling instructions

16. Review and version control

- **Policy owner:** Director/Lead Educator
- **Review frequency:** Annually, or sooner if legal requirements change

Version control

Version	Date	Summary of changes
1.0	17/04/2026	First issue
1.1	17/04/2026	Added one-page quick reference process

Document header (for print)

Safe Skills Training Ltd Website: <https://www.safeskillstraining.com> Email: andy@safeskillstraining.com Business phone: 0330 043 4663

Company logo: insert at top of page when formatting the policy manual.