

Data Protection Policy

1. Policy statement

Safe Skills Training Ltd is committed to protecting personal data and handling it lawfully, fairly, and securely. We recognise that we may process personal data relating to learners/candidates, client contacts, suppliers, and other individuals as part of delivering training services.

Our training services may be delivered to a range of audiences, including (where applicable) health and social care organisations, other industries, and members of the public (for example, open/public courses).

This policy explains our approach to data protection and provides practical guidance for day-to-day handling of personal data. It is intended to be suitable for both internal use and for sharing with clients/learners where appropriate.

2. Scope

This policy applies to:

- All personal data processed by Safe Skills Training Ltd in any format (digital, paper, email, photos/video where used)
- All people acting for or on behalf of Safe Skills Training Ltd (Director/Lead Educator, employees, subcontractors/associates)
- All business activities including marketing, enquiries, training delivery, assessment/competency, certification administration, invoicing, and quality assurance

3. Key definitions

- **Personal data:** Information relating to an identified or identifiable individual.
- **Special category data:** More sensitive data (e.g., health/disability information, racial/ethnic origin) requiring additional safeguards.
- **Processing:** Any activity involving personal data (collecting, storing, sharing, deleting, etc.).
- **Controller:** The organisation that decides why and how personal data is processed.
- **Processor:** A third party that processes personal data on the controller's behalf.

4. Our data protection principles

We follow the core principles of data protection law. Personal data must be:

- **Lawful, fair and transparent**
- **Collected for specified, explicit purposes**
- **Adequate, relevant and limited** to what is necessary
- **Accurate** and kept up to date
- **Kept only as long as necessary**
- **Processed securely**

5. Roles and responsibilities

- **Data protection lead:** Director/Lead Educator (Safe Skills Training Ltd)
- **All staff/associates/subcontractors:** Must follow this policy and any data handling instructions provided.

Where subcontractors are used, Safe Skills Training Ltd will ensure appropriate contractual terms are in place to protect personal data.

6. What personal data we may collect

We aim to collect the minimum necessary. Depending on the service, we may process:

6.1 Learners/candidates (including public/open course attendees)

- Name, employer/organisation (where applicable)
- Attendance and course records
- Assessment/competency evidence (where applicable)
- Certificates/registration details (where applicable)
- Contact details (where needed for joining instructions, changes, cancellations, and certification administration)

6.2 Clients (care providers, managers, HR/training leads, organisers)

- Names, job titles, work contact details
- Enquiry details, booking details, and communications
- Invoicing and payment-related information

6.3 Special category data (limited)

We may process limited special category data where necessary, typically:

- Health/disability information to support reasonable adjustments or safe participation

We avoid collecting detailed medical information unless it is essential.

7. Lawful basis for processing

We will identify a lawful basis for each processing activity. Common lawful bases include:

- **Contract:** To deliver training services and manage bookings
- **Legal obligation:** Where we must keep certain records or comply with applicable law
- **Legitimate interests:** To run and improve the business (e.g., responding to enquiries, maintaining training records, preventing fraud), balanced against individual rights
- **Consent:** Used where required (e.g., certain marketing activities, or where we need explicit consent for specific special category processing)

Where we rely on consent, individuals can withdraw it at any time.

8. Transparency and privacy information

We will provide clear information about:

- What data we collect
- Why we collect it
- How long we keep it
- Who we share it with
- How individuals can exercise their rights

Where appropriate, this may be provided via a privacy notice, booking terms, or pre-course information.

9. Data minimisation and good practice (simple rules)

To keep processes practical and safe:

- Only collect what you genuinely need to deliver the service
- Avoid storing personal data in multiple places
- Save key records to the agreed secure storage location (not only in email)
- Do not use personal devices/accounts for business data unless they are secured and access-controlled
- Do not share personal data via insecure channels

10. Storage, security and access control

We use reasonable and proportionate security measures, including:

- Secure, access-controlled storage (e.g., Google Drive)

- Strong passwords and multi-factor authentication (MFA) where available
- Device security (screen locks, updates, anti-malware where appropriate)
- Limiting access to personal data on a need-to-know basis

Paper records are kept to a minimum, stored securely, and digitised where practical.

11. Sharing personal data

We only share personal data where there is a lawful basis and a clear need.

We may share data with:

- Clients/employers (e.g., attendance/outcomes for sponsored learners) where appropriate
- Professional service providers (e.g., accountant) where necessary
- External certification/verification or quality assurance parties where applicable, sharing only the minimum necessary

We do not sell personal data.

12. International transfers

Where third-party services store data outside the UK, we will take reasonable steps to ensure appropriate safeguards are in place (e.g., recognised transfer mechanisms and contractual protections).

13. Retention and secure disposal

We keep personal data only for as long as necessary for the purpose it was collected.

As a general approach:

- Candidate training/assessment records are typically retained for **6 years** from the course date unless law, contract, insurer, or external rules require longer.
- Routine enquiry communications are retained only as long as needed for follow-up and business records.

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

14. Individual rights

Individuals have rights under data protection law, which may include:

- Right of access
- Right to rectification
- Right to erasure (in certain circumstances)

- Right to restrict processing (in certain circumstances)
- Right to object (in certain circumstances)
- Right to data portability (where applicable)

Requests should be made to:

- andy@safeskillstraining.com

We may need to verify identity before responding.

15. Subject access requests (SARs)

We will respond to SARs within the required legal timescales.

To keep responses accurate and secure, we will:

- Confirm the scope of the request
- Verify identity
- Gather relevant records from our secure storage
- Provide information in a secure format

16. Data breaches and incident management

A personal data breach may include loss, theft, unauthorised access, accidental disclosure, or destruction of personal data.

If a breach is suspected, we will:

- Act immediately to contain it
- Assess the risk to individuals
- Record what happened and actions taken
- Notify affected individuals and/or the relevant authority where required by law

17. Training, awareness and subcontractors

- Anyone acting on behalf of Safe Skills Training Ltd must understand and follow this policy.
- Subcontractors/associates must follow agreed data handling instructions and use secure methods for transferring and storing data.

18. Complaints

If an individual has concerns about how their personal data is handled, they should contact:

- andy@safeskillstraining.com

We will investigate and respond promptly.

19. Review and version control

- **Policy owner:** Director/Lead Educator
- **Review frequency:** Annually, or sooner if there are material changes to law, systems, or business activities

Version control

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Version	Date	Summary of changes
1.0	17/04/2026	First issue
1.1	17/04/2026	Updated scope to cover training delivered to other industries and the general public

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