

4 Minutes Training Ltd

Record Retention Policy

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1. Document Control and Version History

Version Number	Reason for Change	Date
1.0	Initial Release	28 May 2010
1.1	Minor changes including 'soft opt-in' for MailChimp and telephone number change	18 Dec 2017
1.2	Implementation of GDPR data retention policy	16/1/2019
1.3	Review and update	27 July 2026

2. Definitions

Item	Definition
4 Minutes	4 Minutes Training Ltd
Booking	The act of Booking one or more individual places on a course and/or the act of Booking a course for a group of people
Awarding Organisation / Body	The Organisation that oversees 4 Minutes to ensure compliance with its policies and Procedures. It acts as an intermediary between 4 Minutes and Ofqual.
GDPR	The General Data Protection Regulation. Regulations that came into effect April 2018 to control how personal data is used. It is tailored by the Data Protection Act 2018.
ICO	Information Commissioner's Office – Manages Data Protection in the UK
DPR	Data Protection Register
Staff	All staff working for 4 Minutes, either in a salaried, voluntary or Freelance capacity
Opt-In	The process of being subscribed to a list. Before the GDPR came into effect, soft opt-ins were a method of adding pre-existing clients to a list without their knowledge. After the GDPR came into effect, this method was outlawed and personal data may only be added to a list if the subject has given explicit, verifiable consent
Trainer or internal Assessor	A person that delivers the course and also assesses the learning during the course. Normally these roles are combined and a Trainer will be qualified as an Internal Assessor
Regulator	Ofqual in the UK, Qualification Scotland and WG in Wales

3. Overview

- 1.1. 4 Minutes has compulsory undertakings agreeing to commitments in accordance with Awarding Body and the Regulators published procedures, enabling 4 Minutes to deliver approved qualifications, use assessment and verification documents and allow access to data by appointed persons of 4 Minutes, the awarding organisation and the Regulators upon request.
- 1.2. The aim of this policy is to ensure that 4 Minutes retains sufficient Assessment and Verification records to allow for the review of assessment over time whilst not retaining them beyond their reasonable expected life. For First Aid qualifications all assessment evidence is moderated and evaluated by the Awarding Bodies and internally by 4Minutes.

4. Candidate Registration

- 4.1. 4 Minutes collects data from its candidates in accordance with defined Awarding Organisations criteria and, in some cases, their supplied documentation
- 4.2. Candidate details collected:
 - 4.2.1. Hard copy (paper) physical registration documents for each candidate are required to be sent to the awarding body by 4 Minutes or to be kept by 4 Minutes internally. These are archived for 5 years, after which they are destroyed.
 - 4.2.2. Digital information can be forwarded to the Awarding Organisation by 4 Minutes regarding qualifications enrolled upon and achieved. This can be stored by the Awarding Organisation according to the requirements of the Data Protection Act, their Policies and Procedures and the requirements of the Regulators.
 - 4.2.3. For specific information about how the Awarding Organisations and the Regulators use and hold data you are advised to contact them directly.
- 4.3. Candidate details obtained from registration documents can be:
 - 4.3.1. Prefix
 - 4.3.2. First Name
 - 4.3.3. Family (Surname) Name
 - 4.3.4. Date of Birth
 - 4.3.5. Gender
 - 4.3.6. Ethnicity (Groups based upon the most recent census question)
 - 4.3.7. Postal Address
 - 4.3.8. Postcode
 - 4.3.9. Email Address
 - 4.3.10. Telephone
 - 4.3.11. Mobile
 - 4.3.12. Special Needs & Reasonable Adjustment Request
 - 4.3.13. ULN (Unique Learner Number) consent to access and or generate

4.3.14. Signature

4.4. **Newsletter.** Candidates' names and email addresses are added to a email Newsletter list only when the Candidate has specifically agreed. This can happen in one of two ways:

4.4.1. Anyone can opt-in manually via the website.

4.4.2. Candidates on a 4 Minutes First Aid course are given an Evaluation Form at the end of each course. At the end of the Evaluation Form there is a section that allows a candidate to opt in to 4 Minutes' Newsletter. It describes what the implications are and what the name and email address will be used for. Only if the candidate has ticked the 'opt-in' box and also provided their name and email address will 4 Minutes add them to the mailing list.

4.4.3. The Newsletter list is solely for the purposes of sending out occasional (no more than monthly) Newsletters. All Newsletters sent out this way have clear instructions on how to opt out of future Newsletters. These records are retained indefinitely unless the candidate opts out.

5. Candidate Assessment

5.1. 4 Minutes collects data from its candidates in accordance with Awarding Body criteria and/or supplied documentation as well as internal requirements of 4 Minutes.

5.2. 4 Minutes sends all physical assessment evidence it has collected to the Awarding Body and retains copies of assessment decisions and candidate registers, detailing:

5.2.1. What was assessed, when and by whom

5.2.2. The assessment methods

5.2.3. The assessment decision

5.2.4. Tutor and candidate original signatures

5.3. Internal Assessment Verification

5.3.1. 4 Minutes retains any Internal Verification records and activity for its Assessors and Candidates.

5.3.2. These are maintained and stored securely by 4 Minutes according to 4 Minutes policies and procedures and made available to Awarding Bodies and Regulators upon request.

5.3.3. This evidence can be stored on a secure Awarding Body web office database (that may or may not be accessible by 4 Minutes) or by 4 Minutes internally according to our Data Protection Policy.

6. 4 Minutes Staff and Employees

6.1 4 Minutes also collects data from its staff and employees used for the processing of payroll, invoices, sending of course documentation etc. 4 Minutes will treat this data in accordance with its Data Protection Policy.

- 6.2 All 4 Minutes Trainers are enrolled onto a mailing list (names and email addresses) to facilitate the sending out of information about courses requiring Trainers, updates and reminders. These records are retained indefinitely unless the Trainer opts out or 4 Minutes no longer wishes to use the Trainer. Trainers are advised of this method when they agree to deliver courses for 4 Minutes. As with the Newsletter, each mailshot that is sent out has an 'unsubscribe' option at the end. It is expected that all Trainers will use this method, but 4 Minutes is happy to discuss any reasonable alternatives on a case-by-case basis.

7. Summary

- 7.1. 4 Minutes collects and may forward to the Awarding Organisation information including (but not limited to) Registration, Assessment, Verification and Evaluation evidence from candidates and qualifications for analysis to ensure compliance with current equality legislation and future business and qualifications development. This information may be in Hard Copy or scanned electronic form
- 7.2. 4 Minutes may forward all hard copy (paper) physical evidence to the Awarding Body that will be archived for a minimum of 5 years in line with regulatory and/or internal requirements and its internal policies and procedures.
- 7.3. 4 Minutes will retain copies of Qualification Assessments decisions, course register and examination documents for a period of 5 years. These documents are available for inspection by the Awarding Body and/or Regulators as requested. After 5 years they are destroyed.
- 7.4. If candidates request exemption or recognition of prior learning, credit transfer or a ULN (Unique Learner Number) then 4 Minutes will contact the Awarding Body who will either perform these functions with the candidate data or assist 4 Minutes in how to do this function if it is unable to do it internally.
- 7.5. 4 Minutes is required to gather information and data on its staff and employees and will ensure it is stored securely and only retained for as long as it is required
- 7.6. 4 Minutes maintains mailing lists on Branded mailing List Software to facilitate communications with its Trainers and to send out Newsletters to opt-in students.

8. Archiving and Prior Learning

- 8.1. First Aid qualifications are for life but the license to practice is only for 3 years. Thus if the First Aid qualification is required as a unit for a larger qualification, the larger qualification will remain valid. If the qualification is required in its own right then it will have to be re-validated by attending another First Aid Qualification training course after three years.

END OF DOCUMENT