

## OCN London Privacy Notice

### Introduction

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At OCN London we are committed to protecting and respecting our stakeholders' privacy. This privacy notice explains when and why we collect information about our stakeholders, how we use that information, the circumstances under which we share that information with outside agencies, how we keep it secure, and the statutory rights that stakeholders retain over their personal information.

### Who are we?

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OCN London is a not-for-profit Awarding Organisation and Access Validating Agency (AVA) providing and quality assuring nationally recognised qualifications, including Access to Higher Education Diplomas, and accredited courses to a wide variety of education and training providers in the UK.

OCN London is a registered charity (no. 1034750) and a company limited by guarantee (no. 2876147). Our registered address is 70 Gracechurch Street, London, EC3V 0HR.

### How do we collect information from you?

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#### Information you provide us

You provide information to us, for example, when you fill in a form on our website, apply to us for centre approval, book into an event or workshop with us, sign up to our mailing list, get in touch by email or phone, complete our customer survey, apply for a job with us or speak to us at an event.

#### Information we collect about you

We may collect information, for example, about how you use our website by using tracking tools like cookies and other similar technologies stored on your computer, mobile or other device. For more information, please see our Cookies Policy.

#### Information we receive from other sources

We receive information about learners from our Approved Centres. We may receive information from the event organiser if you attend a conference where we have exhibited or have won an award we have sponsored or if you interact with us on social media.

## What type of information is collected from you?

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### Applicants for centre approval and approved centres

If you are an approved centre, or applying for centre approval, we collect organisational information which includes name, company number, contact details and the names, contact details and professional qualifications of key staff members.

### Learner data

Our approved centres provide us with information about learners they are registering on our courses and qualifications, including name, date of birth and Unique Learner Number (where known). They may also provide email addresses and/or telephone numbers.

We may collect sensitive personal data relating to learners' age, ethnicity, employment status, ability status and gender. It is optional for learners to provide this data.

In certain situations, we may require sensitive personal data relating to a learner's health and/or personal circumstances to enable us to process requests for extenuating circumstances, special considerations or reasonable adjustments, appeals or complaints.

### Contact details

We will hold contact details such as your name, email address, phone number and other information relevant to the products and services that we provide.

### Information collected from your use of our website

When you use our website, we may collect information about your use of these, including information such as your IP address. We may also look at how you found our website and what information you looked at to analyse activity on our website. This helps us to improve our service, for example our mail-outs about qualifications and other products. When people sign up to our mailing lists, we collect information on openings and which links recipients click on.

### Email activity

We may collect information about how you respond to our emails and whether you open them or click any links in them.

### Other interactions

We may collect details of your interactions with us at conferences, events, and meetings, on social media, and correspondence via email or telephone.

## How is this information used?

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We may use your information to:

- fulfil any contractual agreements we have made, whether with you as an individual or with the organisation you represent;

- notify you about changes to our services and the qualifications you may be using;
- process a job application;
- personalise our communications with you;
- measure and understand the use, and improve the effectiveness, of our website, communications and systems;
- contact you and advise/update you of the products and services that we provide, including via campaigns;
- seek your views or comments on, or support for, the products and services we provide or are intending to develop.

If you are a learner registered on one of our courses/qualifications, we may use your information to:

- record details of your registration on our courses/qualifications;
- record details of your achievement;
- award any certificates or unit transcripts you are entitled to;
- process requests for extenuating circumstances, special considerations, or reasonable adjustments, appeals or complaints.

We use sensitive personal data relating to learners' age, ethnicity, employment status, ability status and gender to monitor our own performance in relation to providing accreditation to learners with some of the protected characteristics set out in the Equalities Act 2010. The information collected facilitates general reporting that does not refer to identifiable individuals. The monitoring is seen as necessary to implement good practice in relation to improving equality and diversity performance by OCN London and in relation to providing statistics to regulators. Learners can opt to withhold this information without any penalty or sanction. Learners in general are seen as likely to benefit from equality monitoring indirectly, if not individually, but as a group over time.

## Grounds for processing

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We may process information on the following bases:

- Where processing is necessary for the performance of a contract. For example, if you are or applying to be an approved centre; are enquiring about using our qualifications; are a learner registered on a course/qualification at an OCN London approved centre.
- Where processing is with the consent of the natural person. For example, where you have indicated that you wish to receive information from us.
- Where processing is in the legitimate interests of the controller, or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the natural person. For example, where we are required to make information about our qualifications and services available, particularly, but not limited to, cases where there is a regulatory requirement, or where the communication is in the interests of learners or potential learners. This could be to notify you about changes to existing qualifications, or the availability of new qualifications.

## What type of information is collected from you?

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Under no circumstances will OCN London share or rent any of the data it holds to third parties for the purposes of marketing or any other use.

In order for OCN London to meet its statutory regulatory obligations to Ofqual, the regulator for national qualifications, we will share anonymised data regarding learner achievement of OCN London qualifications with Ofqual and/or its nominated partner organisations.

In order for OCN London to meet its statutory regulatory obligations to QAA we will share data regarding learner achievement of Access to HE Diplomas with QAA and/or its nominated partner organisations.

All information sharing is carried out over encrypted channels supplied by Ofqual, QAA or their nominated partner organisations.

From time to time, we may need to share your information with selected third-party business partners, suppliers, and sub-contractors for the performance of a contract we have with them (for example with a partner awarding organisation for the purposes of registration and certification on their qualifications). In such circumstances we only share the data necessary for them to deliver the service and have in place a contract or data sharing and usage agreement that requires them to keep your data secure and not to use it for their own marketing purposes.

We may be required to share your information if we are under a duty to disclose or share your personal information to comply with a legal obligation.

If OCN London were to be acquired by a third party, we might need to transfer your personal information to this third party as part of any business restructuring or reorganisation.

### **How is data stored and how is it kept secure?**

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Keeping information about you secure is very important to us so we store and process your personal information in accordance with the high standards required under data protection legislation. Data is stored in our cloud-based Office 365 environment. In the case of the e-Portfolio system, data is held on Google's servers and secured by Google's security mechanisms. We take reasonable steps to protect your personal data from loss or destruction.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

We do our best to keep the information you disclose to us online secure by putting in place suitable physical, electronic, and managerial procedures. However, we cannot 100% guarantee its security. By using our site, you accept the inherent risks of providing information online and will not hold us responsible for any breach of security.

### **How long is data kept for?**

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OCN London will only hold data for as long as necessary for the purposes specified. As we are obliged to keep a record of learners' achievement over the lifetime of the learner, this information is archived indefinitely, unless the owner of the data requests for its deletion.

### **What rights do I maintain over my information?**

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You may choose to restrict the collection or use of your personal information in the following ways:

- If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at [enquiries@ocnlondon.org.uk](mailto:enquiries@ocnlondon.org.uk).
- If you have registered on our mailing list, you can unsubscribe at any time.
- You may also receive promotional emails from us via Mailchimp, you can unsubscribe from this service at any time.

You already have certain rights under existing data protection legislation, including a right to request a copy of the personal information we hold on you. We will need to verify your identity as part of this process and will require certain details and photographic ID to do this.

You will also have the following rights:

- **Right to correct:** the right to have your personal information rectified if it is inaccurate or incomplete;
- **Right to erase:** the right to request that we delete or remove your personal information from our systems. OCN London maintains methods for the erasure should it be requested;
- **Right to restrict our use of your information:** the right to 'block' us from using your personal information or limit the way in which we can use it;
- **Right to data portability:** the right to request that we move, copy or transfer your personal information;
- **Right to object:** the right to object to our use of your personal information including where we use it for our legitimate interests, or where we use your personal information to carry out market research. If you raise an objection, we will stop processing your personal information unless very exceptional circumstances apply, in which case we will let you know why we're continuing to process your personal information.

We will use reasonable efforts consistent with our legal duty to provide you with your rights in accordance with data protection legislation.

If you have changed your email address or believe any of the information, we hold about you may be inaccurate or out of date please email us at [enquiries@ocnlondon.org.uk](mailto:enquiries@ocnlondon.org.uk) or telephone us on 020 7278 5511.

To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint please contact [enquiries@ocnlondon.org.uk](mailto:enquiries@ocnlondon.org.uk) or call 020 7278 5511.

***Company Secretary use only***

| <b>Document version control</b> |                         |                        |             |
|---------------------------------|-------------------------|------------------------|-------------|
| <b>Version number</b>           | <b>Change or update</b> | <b>Author or owner</b> | <b>Date</b> |
| 1.0                             | First version           | Dixa Patel             | 1 May 2023  |
| 2.0                             | Minor amends            | Barinder Dale          | Jan 2026    |
|                                 |                         |                        |             |