



Data Protection Policy

Contents

1. Introduction	2
1.1. Background	2
1.2. Key Definitions	2
1.3. Purpose and Objectives of Policy.....	2
1.4. Scope and Status of the Policy	2
2. Roles and Responsibilities	2
2.1. CV College’s Executive Team	2
2.2. Information Asset Owners	2
2.3. Data Protection Officer	2
2.4. All staff	2
2.5. All Volunteers.....	2
2.6. Contractors and Consultants	3
3. Compliance with the GDPR	3
3.1. Awareness and Capability	3
3.2. Information Asset Register.....	3
3.3. Privacy by Design.....	3
3.4. Security.....	3
3.5. Record Keeping and Retention	3
3.6. External Contractors and International Transfers.....	3
3.7. Other Third Party Access.....	3
3.8. Internal Sharing.....	3
4. Data Subjects Rights	4
5. Own Personal Data	4
6. Personal Data Breaches	4
7. Compliance	4
8. Further Information	5
9. Key Definitions	5

1. Introduction

1.1. Background

CVQO Ltd, operating as Cadet Vocational College (CV College), is an educational charity whose purpose is to advance the education and training of members of youth movements and young people in schools by enabling them to obtain vocational qualifications. For the purposes of the General Data Protection Regulation (GDPR) CV College is a 'controller' of learner personal data. CV College is a private company limited by guarantee incorporated in England and Wales (registration number 05736932). CV College's registered address is 3 Archipelago, Lyon Way, Camberley, Surrey, GU16 7ER. CV College is a charity registered in England and Wales (registration number 1115234) and Scotland (registration number SCO 39261).

CV College processes the personal data of living individuals such as its staff, students, contractors, research subjects and customers. This processing is regulated by the General Data Protection Regulation (GDPR). The UK's regulator for the GDPR is the Information Commissioner's Office (ICO).

1.2. Key Definitions

The GDPR contains a number of key definitions which are referenced in this policy such as 'personal data', 'processing' and 'Data Controller'. Those definitions are set out below in section 8.

1.3. Purpose and Objectives of Policy

This policy sets out CV College's commitment to comply with the General Data Protection Regulation (GDPR).

1.4. Scope and Status of the Policy

This policy applies to all CV College staff, learners, volunteers and others who use or process any personal data. This policy applies regardless of where personal data is held and or the equipment used if the processing is for CV College's purposes. Further, the policy applies to all personal data and special category data held in any form whether manual paper records or electronic records.

2. Roles and Responsibilities

2.1. CV College's Executive Team

CV College's Executive Team is responsible for approval of the policy, strategic level implementation of the policy, oversight of compliance with the policy and reporting identified risks to the Board.

2.2. Information Asset Owners

CV College will appoint Information Asset Owners (IAOs) with responsibility for data protection compliance for personal data processed in their areas. The IAOs are recorded in CV College's Information Asset Register (see 2.2 below).

2.3. Data Protection Officer

CV College's Data Protection Officer (DPO) is primarily responsible for advising on and assessing the Charity's compliance with the GDPR and making recommendations to improve practice in this area. Further, the DPO acts as CV College's primary point of contact for GDPR matters.

2.4. All staff

All staff, including permanent staff, fixed term contractors and temporary workers must comply with this Policy and the GDPR whenever processing personal data held by CV College or on behalf of CV College.

2.5. All Volunteers

All Cadet Force Vocational Qualification Officers (VQOs) are responsible for compliance with the rules and policies made by CV College. VQOs must comply with this policy where collecting and processing personal data in relation to CV College courses and learners.

2.6. Contractors and Consultants

Third parties such as consultants, contractors or agents, undertaking work on behalf of CV College involving personal data, must adhere to CV College's Data Protection Policy and comply with the GDPR. Provision will be made in contracts with external providers to ensure compliance with this Policy and the GDPR.

3. Compliance with the GDPR

3.1. Awareness and Capability

CV College will implement, and monitor completion of, mandatory Data Protection training for all staff. The content of that training will be reviewed annually. Full details are provided in CV College's Staff Training Policy.

3.2. Information Asset Register

CV College will maintain an Information Asset Register (IAR), which will provide a record of processing activities detailing what personal data is held, where it came from, who it is shared with and what it is used for.

3.3. Privacy by Design

CV College will implement a Privacy by Design Approach to processing personal data through integrating Data Privacy Impact Assessments into business projects. Full details are provided in CV College's Data Protection Impact Assessment (DPIA) Policy.

3.4. Security

CV College will protect the security of personal data by maintaining and monitoring compliance with the CV College Information Security Policy.

3.5. Record Keeping and Retention

CV College will include details within the IAR showing retention rules setting the periods for which records containing personal data are to be retained and will manage the retention and disposal of personal data in accordance with its Records Retention Policy.

3.6. External Contractors and International Transfers

CV College will enter into legally binding contracts with external bodies where those bodies are engaged to process personal data on our behalf. CV College will implement adequacy arrangements where transferring any personal data outside of the European Union.

3.7. Other Third Party Access

CV College will only disclose personal data to third parties such as the police, central government and other education institutions where there is a lawful basis for doing so and appropriate arrangements are in place with those parties.

3.8. Internal Sharing

CV College will seek to ensure that personal data is only shared across different teams within the Charity where those areas have a business need for accessing that data.

4. Data Subjects Rights

CV College will comply with requests from an individual in exercising their rights under the GDPR. Under the GDPR, individuals also have the following rights in relation to their personal data:

- The right to be informed about the collection and use of their personal data
- The right to know what information is held about them and to receive a copy of that information.
- The right to request their personal data is rectified if inaccurate.
- The right to request erasure of their personal data.
- The right to request that the processing of their personal data is restricted.
- The right of portability in relation to their personal data.
- The right to object to the processing of their personal data.
- The right to object to processing which involves automated decision making or profiling.

CV College will publish Privacy Policies and Notices to ensure the right of data subjects to be informed is satisfied. CV College will handle requests from data subjects to exercise any of the above rights in accordance with its Data Subject Rights Policies.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

Individuals who wish to exercise the above rights should contact CV College's Data Protection Officer through our website www.cvcollege.org by clicking on Contact Us and completing an information request enquiry, by sending an email to dpo@cvcollege.org or by writing to the Data Protection Officer, Cadet Vocational College, 3 Archipelago, Lyon Way, Camberley, Surrey, GU16 7ER.

Any staff member who receives a request from an individual to exercise the above rights under the GDPR must be forwarded to CV College's Data Protection Officer (DPO): dpo@cvcollege.org. All staff are responsible for cooperating with the DPO to ensure that CV College can comply with an individual's request under the GDPR within the statutory timescales.

5. Own Personal Data

All staff, VQOs and learners are responsible for checking that information they provide in connection with CV College's vocational qualifications is accurate and up to date. Any changes to personal data provided (e.g. change of address) must be promptly notified, in writing, to Cadet Vocational College Learner Support Services. CV College cannot be held responsible for errors unless the member of staff, VQO or learner has properly informed CV College about them.

All staff are responsible for checking that information they provide to CV College in connection with their employment is accurate and up to date. Any changes to personal data provided (e.g. change of address) must be promptly notified by update through CV College's on-line HR management system (myHRToolKit).

6. Personal Data Breaches

CV College will respond promptly to any identified personal data breaches, which will be dealt with in accordance with its Personal Data Breach Policy.

7. Compliance

Compliance with this Policy and the GDPR is the responsibility of all members of staff, VQOs and learners. Employees must comply with the rules and procedures made by CV College. It is a condition of being a learner with CV College that all of CV College's rules and policies are fully complied with.

Any breach of the policy by a member of staff may result in disciplinary action.

Any breach of the GDPR by CV College may result in a substantial fine or actions imposed upon the Charity by the ICO.

8. Further Information

Questions about the interpretation or operation of this policy should be taken up in the first instance with CV College's DPO: dpo@cvcollge.org . Any individual who considers that the Policy has not been followed in respect of personal data about themselves should also raise the matter with the DPO.

Further information about the GDPR can be found on the Information Commissioner's Office ([ICO website](#)).

9. Key Definitions

'Personal Data' means data which relate to a living individual who can be identified from those data or from those data and other information which is in the possession of, or is likely to come into the possession of, the Data Controller and includes any expression of opinion about the individual and any indication of the intentions of the Data Controller or any other person in respect of the individual. Under the GDPR, the definition of personal data will explicitly extend to IP addresses.

'Special category data' means any personal data information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and their genetic or biometric data.

'Processing' means any operations or set of operations which is performed on personal data whether or not by automated means such as collection, use, disclosure or storage of personal data etc.

'Data Controller' means the organisation which, either alone or jointly with another organisation, determines the manner and purpose of the processing of personal data. The Data Controller is responsible for compliance with the GDPR.

'Data Processor' means an organisation (such as a contractor) which processes personal data on behalf of a Data Controller.

'Personal Data Breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.



Data Subject Rights Policy

Contents

1	Introduction	4
2	Rights.....	4
2.1	Right to be Informed	4
2.2	Right of Access.....	4
2.3	Right to Rectification	4
2.4	Right to Erasure	4
2.5	Right to Restrict Processing.....	5
2.6	Right to Data Portability	5
2.7	Right to Object.....	5
2.8	Rights in Relation to Automated Decision Making and Profiling.....	5
3	Making a Request.....	5
4	Handling a Request	6
4.1	Verify the identity of the data subject	6
4.2	Verify the request.....	6
4.3	Verify whether requests are unfounded or excessive.....	6
4.4	Promptly acknowledge receipt of the request.....	6
4.5	Verify whether the data requested also involves data on other data subjects	6
4.6	Action the request.....	6
4.7	Confirm action taken	7

1 Introduction

CVQO Ltd, operating as Cadet Vocational College (“CV College”), will comply with requests from individuals exercising their rights under the General Data Protection Regulation (GDPR).

Under GDPR individuals have the following rights in relation to their personal data:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling.

Each of these rights is set out in more detail in the following section.

CV College will handle any requests from a data subject to exercise these rights in accordance with this policy.

2 Rights

2.1 Right to be Informed

Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency requirement under the GDPR. CV College addresses this right through its Privacy Policy and Privacy Notices.

2.2 Right of Access

Individuals have the right to request a copy of the personal data that CV College holds about them by contacting us through our website, email or by post (full details are shown below). Please note that there are exceptions to this right. We may be unable to make all information available to individuals if, for example, making the information available to individuals would reveal personal data about another person, if we are legally prevented from disclosing such information, if there is no basis for the individual’s request or if it is manifestly unfounded or excessive.

2.3 Right to Rectification

We aim to keep individuals’ personal data accurate and complete. We encourage individuals to contact us using the contact details provided below to let us know if any of their personal data is not accurate or changes, so that we can keep their personal data up-to-date.

2.4 Right to Erasure

Individuals have the right to request the deletion of their personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where individuals withdraw their consent to processing, where there is no overriding legitimate interest for us to continue to process their personal data or their personal data has been unlawfully processed. If individuals would like to request that their personal data is erased they should contact us using the contact details provided below.

2.5 Right to Restrict Processing

In certain circumstances, individuals have the right to request that we restrict the further processing of their personal data. This right arises where, for example, individuals have queried the accuracy of the personal data we hold about them and we are verifying the information, individuals have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests or the processing is unlawful and individuals elect that processing is restricted rather than deleted. If individuals would like to request that we restrict further processing of their personal data they should contact us using the contact details provided below.

2.6 Right to Data Portability

In certain circumstances, individuals have the right to request that some of their personal data is provided to them or to another data controller, in a commonly used, machine-readable format. This right arises where individuals have provided their personal data to us, the processing is based on consent or the performance of a contract and processing is carried out by automated means. If individuals would like to make such a request they should contact us using the contact details provided below.

2.7 Right to Object

In certain circumstances, individuals have the right to object to the processing of their personal data where, for example, their personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process their personal data or if the individual's data is being processed for direct marketing purposes. If individuals would like to object to the processing of their personal data they should contact us using the contact details provided below.

2.8 Rights in Relation to Automated Decision Making and Profiling

CV College does not engage in automated individual decision-making (making a decision solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain things about an individual). If we did undertake such processing, individuals would have the rights to have information about the processing and to request human intervention or challenge decisions and we would have to carry out regular checks to make sure that our systems were working as intended.

3 Making a Request

Individuals who wish to exercise the rights set out in this policy should contact CV College's Data Protection Officer through our website www.cvcollege.org by clicking on Contact Us and completing an information request enquiry, by sending an email to dpo@cvcollege.org or by writing to the Data Protection Officer, CV College, 3 Archipelago, Lyon Way, Camberley, Surrey, GU16 7ER.

4 Handling a Request

On receipt of a request CV College will:

4.1 Verify the identity of the data subject

If needed, we will request any further evidence necessary to verify the identity of the data subject.

4.2 Verify the request

We will review the request to determine if it is sufficiently clear which rights are being exercised and what has been requested. If the request is not sufficiently clear, we will request additional information.

4.3 Verify whether requests are unfounded or excessive

We will consider the request to determine if it is unfounded or excessive, in particular, if it is repetitive in character. If this is the case we may refuse to act on the request or we may charge a reasonable fee.

4.4 Promptly acknowledge receipt of the request

We will promptly acknowledge receipt of the request and inform the data subject of the steps that will be taken and the expected time frame to deal with the request. This will be done on a timely basis and will not exceed one month to complete, unless the request is particularly complex, in which case we may advise the data subject that we will need additional time. The additional time required could be up to two additional months, but will only be extended by the time necessary to address the request.

4.5 Verify whether the data requested also involves data on other data subjects

If the data requested also involves other data subjects the data will be filtered before the requested data is supplied to the data subject. If the data cannot be filtered, we will seek the consent of other data subjects before supplying any such data.

4.6 Action the request

We will perform the appropriate action(s) according to the nature of the request, as set out in the table below:

Request	Action
The right of access	Provide the appropriate information (if the request was submitted in electronic form, any information should preferably be provided by electronic means as well)
The right to rectification	Correct the data
The right to erasure	Delete personal data
The right to restrict processing	Stop the specified further processing
The right to data portability	Provide the appropriate information (Note: if personal data is being processed on the basis of legitimate interest, the data subject does not have this right.)
The right to object	Stop all further processing

In the case of a request for access the information provided will include:

- the purposes of the processing;
- the categories of personal data concerned;

- the recipients or categories of recipients to whom personal data has been or will be disclosed, in particular in respect of transfers outside of the European Union, including any appropriate safeguards for transfer of data;
- where possible, the envisaged period for which personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- the right to lodge a complaint with the ICO; and,
- if the data has not been collected from the data subject: the source of such data.

4.7 Confirm action taken

Advise the data subject that the request has been actioned or if not the reasons for this and explain that the matter is now concluded.



Privacy Notice – Learner Agreement ESFA

Contents

Privacy Notice: How We Use Your Personal Information.....	4
Introduction.....	4
What personal data do we collect?.....	4
How do we use your personal data?	4
Who do we share your personal data with?	4
Further Information and Exercising Your Rights.....	5
ESFA Privacy Notice: How We Use Your Personal Information	5

Privacy Notice: How We Use Your Personal Information

Introduction

CVQO Ltd, operating as Cadet Vocational College (“CV College”), is an educational charity whose purpose is to advance the education and training of youth and adult members of youth movements and schools to enable them to obtain vocational qualifications.

What personal data do we collect?

We collect your name, address, gender, date of birth, email address and telephone number(s). We will also collect other personal data related to your studies, experience and qualifications. This may include images and video of you performing tasks relating to the course(s). This personal data is provided to us by you, the Cadet Forces and government and industry bodies.

We may also collect from you sensitive personal data, such as information about your health, learning disabilities and ethnicity.

How do we use your personal data?

We may use your personal data, including information relating to any learning difficulty or disability that you disclose to us, where this is necessary to pursue our legitimate interests as a provider of vocational qualifications, including to:

- support and evaluate your progress on the qualification(s) on which you are enrolled;
- undertake administration in relation to the qualification(s) on which you are enrolled;
- assess and provide reasonable adjustments in relation to your learning or assessment where requested, including with regard to any learning difficulty or disability that you have disclosed to us; and,
- contact you in relation to CV College qualifications, courses, news, awards, events, surveys, offers and promotions that may be of interest to you.

We may also use any sensitive personal data, such as information about your health, learning disabilities and ethnicity that you have disclosed to us for statistical purposes.

We may use your personal data, including images and video of you, in our promotional activities where you have given your consent for us to do so.

Who do we share your personal data with?

We may share your personal data with relevant third parties, where necessary, in relation to your learning, assessment, or certification, including:

- funding bodies, including the Education and Skills Funding Agency (ESFA);
- regulatory authorities, awarding bodies, and similar industry bodies;
- assessors, mentors, markers and others involved in the evaluation and quality control of our qualifications;
- service providers contracted to us in connection with provision of the products and services such as providers of IT services and customer relationship management services; and,
- if you are under 18, with your parents or guardians.

We may share sensitive personal data relating to any learning difficulty or disability that you disclose to us with assessors and awarding bodies for the purposes of making reasonable adjustment when evaluating your performance on the qualification(s) for which you are enrolled. We may also share any sensitive personal data, such as information about your health, learning disabilities and ethnicity that you have disclosed to us with Government bodies for statistical purposes.

Further Information and Exercising Your Rights

Full details of our Privacy Policy for Learner Personal Data, including your rights in respect of your personal data, can be found on our website www.cvcollege.org. If you have any questions about our policy, would like to exercise any of your rights or wish to make a complaint please contact our Data Protection Officer through our website www.cvcollege.org by clicking on Contact Us and making a Data Protection Request, by sending an email to dpo@cvcollege.org or by writing to the Data Protection Officer, CV College, 3 Archipelago, Lyon Way, Camberley, Surrey, GU16 7ER.

ESFA Privacy Notice: How We Use Your Personal Information

This privacy notice is issued by the Education and Skills Funding Agency (ESFA) on behalf of the Secretary of State for the Department of Education (DfE) to inform learners about the Individualised Learner Record (ILR) and how their personal information is used in the ILR. Your personal information is used by the DfE to exercise our functions under article 6(1)(e) of the UK GDPR and to meet our statutory responsibilities, including under the Apprenticeships, Skills, Children and Learning Act 2009.

The ILR collects data about learners and learning undertaken. Publicly funded colleges, training organisations, local authorities, and employers (FE providers) must collect and return the data to the ESFA each year under the terms of a funding agreement, contract or grant agreement. It helps ensure that public money distributed through the ESFA is being spent in line with government targets. It is also used for education, training, employment, and well-being purposes, including research. We retain ILR learner data for 3 years for operational purposes and 66 years for research purposes. For more information about the ILR and the data collected, please see the ILR specification at <https://www.gov.uk/government/collections/individualised-learner-record-ilr> <https://www.gov.uk/government/collections/individualised-learner-record-ilr>

ILR data is shared with third parties where it complies with DfE data sharing procedures and where the law allows it. The DfE and the English European Social Fund (ESF) Managing Authority (or agents acting on their behalf) may contact learners to carry out research and evaluation to inform the effectiveness of training.

For more information about how your personal data is used and your individual rights, please see the DfE Personal Information Charter (<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>) and the ESFA Privacy Notice (<https://www.gov.uk/government/publications/esfa-privacy-notice>)

If you would like to get in touch with us or request a copy of the personal information DfE holds about you, you can contact the DfE in the following ways:

- Using our online contact form
<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>
- By telephoning the DfE Helpline on 0370 000 2288
- Or in writing to – Data Protection Officer, Ministerial and Public Communications Division, Department for Education, Piccadilly Gate, Store Street, Manchester, M1 2WD

If you are unhappy with how we have used your personal data, you can complain to the Information Commissioner's Office (ICO) at:
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. You can also call their helpline on 0303 123 1113 or visit <https://www.ico.org.uk>



Privacy Notice – Learner Agreement Non-ESFA

Contents

Privacy Notice: How We Use Your Personal Information.....	4
Introduction.....	4
What personal data do we collect?	4
How do we use your personal data?	4
Who do we share your personal data with?.....	4
Further Information and Exercising Your Rights.....	5

Privacy Notice: How We Use Your Personal Information

Introduction

CVQO Ltd, operating as Cadet Vocational College (“CV College”), is an educational charity whose purpose is to advance the education and training of youth and adult members of youth movements and schools to enable them to obtain vocational qualifications.

What personal data do we collect?

We collect your name, address, gender, date of birth, email address and telephone number(s). We will also collect other personal data related to your studies, experience and qualifications. This may include images and video of you performing tasks relating to the course(s). This personal data is provided to us by you, the Cadet Forces and government and industry bodies.

We may also collect from you sensitive personal data, such as information about your health, learning disabilities and ethnicity.

How do we use your personal data?

We may use your personal data, including information relating to any learning difficulty or disability that you disclose to us, where this is necessary to pursue our legitimate interests as a provider of vocational qualifications, including to:

- support and evaluate your progress on the qualification(s) on which you are enrolled;
- undertake administration in relation to the qualification(s) on which you are enrolled;
- assess and provide reasonable adjustments in relation to your learning or assessment where requested, including with regard to any learning difficulty or disability that you have disclosed to us; and,
- contact you in relation to CV College qualifications, courses, news, awards, events, surveys, offers and promotions that may be of interest to you.

We may also use any sensitive personal data, such as information about your health, learning disabilities and ethnicity that you have disclosed to us for statistical purposes.

We may use your personal data, including images and video of you, in our promotional activities where you have given your consent for us to do so.

Who do we share your personal data with?

We may share your personal data with relevant third parties, where necessary, in relation to your learning, assessment, or certification, including:

- relevant funding bodies, including the Education and Skills Funding Agency, the Welsh Government and the Ministry of Defence;
- regulatory authorities, awarding bodies, and similar industry bodies;
- assessors, mentors, markers, your youth organisation or school and others involved in supporting your studies and in the evaluation and quality control of our qualifications;
- service providers contracted to us in connection with provision of the products and services such as providers of IT services and customer relationship management services; and,
- if you are under 18, with your parents or guardians.

We may share sensitive personal data relating to any learning difficulty or disability that you disclose to us with assessors and awarding bodies for the purposes of making reasonable

adjustment when evaluating your performance on the qualification(s) for which you are enrolled. We may also share any sensitive personal data, such as information about your health, learning disabilities and ethnicity that you have disclosed to us with Government bodies for statistical purposes.

Further Information and Exercising Your Rights

Full details of our Privacy Policy for Learner Personal Data, including your rights in respect of your personal data, can be found on our website www.cvcollege.org. If you have any questions about our policy, would like to exercise any of your rights or wish to make a complaint please contact our Data Protection Officer through our website www.cvcollege.org by clicking on Contact Us and making a Data Protection Request, by sending an email to dpo@cvcollege.org or by writing to the Data Protection Officer, CV College, 3 Archipelago, Lyon Way, Camberley, Surrey, GU16 7ER.



Privacy Notice – Learner Personal Data

Contents

Introduction.....	4
Who are we?	4
What personal data do we collect?	4
How do we use your personal data?	4
Who do we share your personal data with?	5
Data shared with the Education and Skills Funding Agency (ESFA)	6
ESFA Privacy Notice: How We Use Your Personal Information	6
How long will we keep your personal data?	7
Where do we store your personal data and how is it protected?	7
Your rights	7
Right to be Informed	7
Right to Access.....	7
Right to Rectification	7
Right to Erasure	7
Right to Object.....	8
Right to Restrict Processing	8
Right to Data Portability	8
Rights in Relation to Automated Decision Making and Profiling.....	8
Contact	8
Complaints	9
Changes to our Policies.....	9

Introduction

CVQO Ltd, operating as Cadet Vocational College (“CV College”), is committed to data security and the fair and transparent processing of personal data. This privacy notice sets out how CV College treats learner personal data.

Please read this Policy carefully as it contains important information on who we are, how and why we collect, store, use and share your personal data, your rights in relation to your personal data, how to contact us and how to contact supervisory authorities in the event that you would like to report a concern about the way in which we process your personal data.

Who are we?

CV College is an educational charity whose purpose is to advance the education and training of youth and adult members of youth movements and schools to enable them to obtain vocational qualifications.

For the purposes of the General Data Protection Regulation (GDPR) CV College is a ‘controller’ of learner personal data.

CVQO Ltd is a private company limited by guarantee incorporated in England and Wales (registration number 05736932).

CVQO Ltd is a charity registered in England and Wales (registration number 1115234) and Scotland (registration number SCO 39261).

CVQO Ltd’s registered address is 3 Archipelago, Lyon Way, Camberley, Surrey, GU16 7ER.

What personal data do we collect?

We collect your name, address, gender, date of birth, email address and telephone number(s). We will also collect other personal data related to your studies, experience and qualifications to evidence your progress on the course(s) on which you are enrolled and for our quality assurance processes, investigations, complaints and appeals. This may include images and video of you performing tasks relating to the course(s). This personal data is provided to us by you, the Cadet Forces and government and industry bodies.

We may also collect from you sensitive personal data, such as information about your health, learning disabilities and ethnicity.

How do we use your personal data?

We may use your personal data where this is necessary to pursue our legitimate interests as a provider of vocational qualifications, including to:

- support and evaluate your progress on the qualification(s) on which you are enrolled;
- undertake administration in relation to the qualification(s) on which you are enrolled;
- provide you with a certificate, credential or other record of learning;
- contact you directly in relation to our quality assurance processes, investigations, appeals, and complaints;
- assess and provide reasonable adjustments in relation to your learning or assessment where requested, including with regard to any learning difficulty or disability that you have disclosed to us; and,
- contact you in relation to CV College qualifications, courses, news, awards, events, surveys, offers and promotions that may be of interest to you.

We may also use any sensitive personal data, such as information about your health, learning disabilities and ethnicity that you have disclosed to us for statistical purposes.

We may use your personal data, including images and video of you, in our promotional activities where you have given your consent for us to do so.

We may also process your personal data if required by law, including to respond to requests by government or law enforcement authorities or for the prevention of crime or fraud.

Who do we share your personal data with?

We may share your personal data with relevant third parties, where necessary, in relation to your learning, assessment, or certification, including:

- relevant funding bodies, including the Education and Skills Funding Agency (see further details below), the Welsh Government and the Ministry of Defence;
- regulatory authorities, awarding bodies, and similar industry bodies;
- assessors, mentors, markers, your youth organisation or school and others involved in supporting your studies and in the evaluation and quality control of our qualifications;
- service providers contracted to us in connection with provision of the products and services such as providers of IT services and customer relationship management services; and,
- if you are under 18, with your parents or guardians.

We may share sensitive personal data relating to any learning difficulty or disability that you disclose to us with assessors and awarding bodies for the purposes of making reasonable adjustment when evaluating your performance on the qualification(s) for which you are enrolled. We may also share any sensitive personal data, such as information about your health, learning disabilities and ethnicity that you have disclosed to us with Government bodies for statistical purposes.

We may also share your personal data with third party providers including:

- legal and other professional advisers, consultants, and professional experts;
- service providers contracted to us in connection with provision of learning, assessment and training products and services such as markers, moderators, assessors, certification providers and IT services; and,
- analytics and search engine providers that assist us in the improvement and optimisation of our website.

We will ensure there is a contract in place with such third parties which include obligations in relation to the confidentiality, security and lawful processing of any personal data shared with them.

Where a third-party recipient is located outside the European Economic Area, we will ensure that the transfer of personal data is protected by appropriate safeguards, including the use of model data protection clauses adopted or approved by the Information Commissioners Office (ICO).

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

We may also share personal data with law enforcement or other authorities if required by applicable law.

Data shared with the Education and Skills Funding Agency (ESFA)

CV College is a charity and a large proportion of the qualifications we provide are funded by the ESFA and the following privacy notice issued by the ESFA applies to these qualifications:

ESFA Privacy Notice: How We Use Your Personal Information

This privacy notice is issued by the Education and Skills Funding Agency (ESFA) on behalf of the Secretary of State for the Department of Education (DfE) to inform learners about the Individualised Learner Record (ILR) and how their personal information is used in the ILR. Your personal information is used by the DfE to exercise our functions under article 6(1)(e) of the UK GDPR and to meet our statutory responsibilities, including under the Apprenticeships, Skills, Children and Learning Act 2009.

The ILR collects data about learners and learning undertaken. Publicly funded colleges, training organisations, local authorities, and employers (FE providers) must collect and return the data to the ESFA each year under the terms of a funding agreement, contract or grant agreement. It helps ensure that public money distributed through the ESFA is being spent in line with government targets. It is also used for education, training, employment, and well being purposes, including research. We retain ILR learner data for 3 years for operational purposes and 66 years for research purposes. For more information about the ILR and the data collected, please see the ILR specification at <https://www.gov.uk/government/collections/individualised-learner-record-ilr> <https://www.gov.uk/government/collections/individualised-learner-record-ilr>

ILR data is shared with third parties where it complies with DfE data sharing procedures and where the law allows it. The DfE and the English European Social Fund (ESF) Managing Authority (or agents acting on their behalf) may contact learners to carry out research and evaluation to inform the effectiveness of training.

For more information about how your personal data is used and your individual rights, please see the DfE Personal Information Charter (<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>) and the ESFA Privacy Notice (<https://www.gov.uk/government/publications/esfa-privacy-notice>)

If you would like to get in touch with us or request a copy of the personal information DfE holds about you, you can contact the DfE in the following ways:

- Using our online contact form <https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>
- By telephoning the DfE Helpline on 0370 000 2288
- Or in writing to – Data Protection Officer, Ministerial and Public Communications Division, Department for Education, Piccadilly Gate, Store Street, Manchester, M1 2WD

If you are unhappy with how we have used your personal data, you can complain to the Information Commissioner's Office (ICO) at: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. You can also call their helpline on 0303 123 1113 or visit <https://www.ico.org.uk>

How long will we keep your personal data?

We will retain personal data relating to your learning, assessment and certification, our quality assurance processes, appeals or investigations for a period of 6 years to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements or any orders from competent courts or authorities.

Where do we store your personal data and how is it protected?

CV College stores data held in hard copy at its head office and that held digitally in a UK data centre within a secure and continually monitored facility. Some personal data is also held by CV College field staff, where this is necessary for them to perform their duties in respect of current and potential learners. We take reasonable steps to protect your personal data from loss or destruction, including training all of our staff on CV College data protection policies and practices. We also have procedures in place to deal with any suspected data security breach. We will notify you and the Information Commissioners Office (ICO) of a suspected data security breach where we are legally required to do so.

Your rights

Under the GDPR, you have various rights with respect to our use of your personal data, as follows:

Right to be Informed

You have the right to be informed about the collection and use of your personal data. This is a key transparency requirement under the GDPR. CV College will provide you with information including: our purposes for processing your personal data, our retention periods for that personal data and who it will be shared with. We will do this through our Privacy Policies and Notices.

Right to Access

You have the right to request a copy of the personal data that we hold about you by contacting us using the contact details provided below. Please include with your request information that will enable us to verify your identity. We will respond within 1 month of the request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information, or if there is no basis for your request, or if it is excessive.

Right to Rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.

Right to Erasure

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

Right to Object

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data or if your data is being processed for direct marketing purposes. If you would like to object to the processing of your personal data, please contact us using the contact details provided below.

Right to Restrict Processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have queried the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests or the processing is unlawful and you elect that processing is restricted rather than deleted. If you wish to exercise this right please contact us using the contact details provided below.

Right to Data Portability

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to make such request, please contact us using the contact details provided below.

Rights in Relation to Automated Decision Making and Profiling

CV College does not engage in automated individual decision-making (making a decision solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain things about an individual). If we did undertake such processing, individuals would have the rights to have information about the processing and to request human intervention or challenge decisions and we would have to carry out regular checks to make sure that our systems were working as intended.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response

Contact

If you have any queries about this Policy, the way in which CV College processes personal data or would like to exercise any of your rights, set out above, please contact our Data Protection Officer:

- through our website www.cvcollege.org by clicking [here](#) and completing a request;
- by sending an email to dpo@cvcollege.org; or,
- by writing to the Data Protection Officer, CV College, 3 Archipelago, Lyon Way, Camberley, Surrey, GU16 7ER.

Complaints

If you believe that your data protection rights may have been breached and we have been unable to resolve your concern, you may lodge a complaint with the applicable supervisory authority or seek a remedy through the courts.

Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

Changes to our Policies

Any changes we may make to our Policy in the future will be posted on this page and where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Policy.



Privacy Notice – Vocational Qualification Officers (VQOs) & Other Adult Enablers

Contents

Privacy Notice: How We Use Your Personal Information	4
Who we are?	4
What personal data do we collect?	4
How do we use your personal data?	4
Who do we share your personal data with?.....	4
Further information and Exercising Your Rights.....	4

Privacy Notice: How We Use Your Personal Information

Who we are?

CVQO Ltd, operating as Cadet Vocational College (“CV College”), is an educational charity whose purpose is to advance the education and training of youth and adult members of youth movements and schools to enable them to obtain vocational qualifications.

What personal data do we collect?

We collect your name, contact details, service number and Disclosure and Barring Service (DBS) details. This personal data is provided to us by you or your youth organisation.

How do we use your personal data?

We may use your personal data where this is necessary to pursue our legitimate interests as a provider of vocational qualifications, including to:

- support and evaluate the progress of learners in your organisation;
- undertake administration in relation to the qualification(s) on which they are enrolled; and,
- to keep you informed about CV College qualifications, courses, news, awards, events, surveys, offers and promotions that may be of interest to learners or potential learners in your organisation.

We may use your personal data, including images and video of you, in our promotional activities where you have given your consent for us to do so.

Who do we share your personal data with?

We may share your personal data with relevant third parties, where necessary, in relation to the learning, assessment or certification of learners in your organisation, including:

- regulatory authorities, awarding bodies, and similar industry bodies; and,
- service providers contracted to us in connection with provision of the products and services such as providers of IT services and customer relationship management services

Further information and Exercising Your Rights

Full details of our Privacy Policy, including your rights in respect of your personal data, can be found on our website www.cvcollege.org. If you have any questions about our policy, would like to exercise any of your rights or wish to make a complaint please contact our Data Protection Officer through our website www.cvcollege.org by clicking on the Contact Us and making a Data Protection Request, by sending an email to dpo@cvcollege.org or by writing to the Data Protection Officer, CV College, 3 Archipelago, Lyon Way, Camberley, Surrey, GU16 7ER.



Privacy Notice Website

Table of Contents

Introduction.....	4
Who are we?	4
What personal data do we collect?	4
Information we collect about you if you visit our Website	4
Information that we receive from other sources:	4
Sensitive personal information.....	5
What do we use your personal data for?	5
Who do we share your personal data with?	5
How long will we keep your personal data?	6
Where do we store your personal data and how is it protected?	6
Your rights	7
Right to be informed	7
Right to Access	7
Right to Rectification	7
Right to Erasure	7
Right to Object.....	7
Right to Restrict Processing	7
Right to Data Portability	8
Rights in Relation to Automated Decision Making and Profiling.....	8
Contact.....	8
Complaints	8
Changes to our Policies.....	8

Introduction

CVQO Ltd, operating as Cadet Vocational College (“CV College”) is committed to data security and the fair and transparent processing of personal data. This privacy notice sets out how CV College treats learner personal data.

Please read this notice carefully as it contains important information about who we are, how and why we collect, store, use and share your personal data, your rights in relation to your personal data, how to contact us and how to contact supervisory authorities in the event that you would like to report a concern about the way in which we process your personal data.

Who are we?

CV College is an educational charity whose purpose is to advance the education and training of youth and adult members of youth movements and schools to enable them to obtain vocational qualifications.

For the purposes of the General Data Protection Regulation (GDPR) CV College is a ‘controller’ of learner personal data.

CVQO Ltd is a private company limited by guarantee incorporated in England and Wales (registration number 05736932).

CVQO Ltd is a charity registered in England and Wales (registration number 1115234) and Scotland (registration number SCO 39261).

CVQO Ltd’s registered address is 3 Archipelago, Lyon Way, Camberley, Surrey, GU16 7ER.

What personal data do we collect?

We may collect and process personal data from information you provide to us if you:

- complete a form on our Website;
- complete a survey;
- correspond with us by phone, e-mail, or in writing;
- report a problem;
- sign up to receive our communications;
- create an account with us;
- enter into a contract with us to receive products and/or services,

We may collect your name, e-mail address, postal address, telephone number and job role.

Information we collect about you if you visit our Website

We may automatically collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and,
- information about your visit to our Website such as the products and/or services you searched for and viewed, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

Information that we receive from other sources:

We may also receive information about you if you use any of the other websites we operate

or the other services we provide.

If you are a Vocational Qualification Officer (VQO) or learner in the Cadets, we may also receive information about you from your Cadet Force. This also applies to other adults working within the supervisory structure – Commandants, Area Officers, Area Training Officers, etc.

Sensitive personal information

In certain limited cases, we may collect certain sensitive personal data from you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences, or genetic or biometric data).

What do we use your personal data for?

When we ask you to supply us with personal data we will make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you or whether the supply of any personal data we ask for is optional.

Contract performance: we may use your personal data to fulfil a contract, or take steps linked to a contract:

- to provide the products and/or services to you;
- to communicate with you in relation to the provision of the contracted products and services;
- to provide you with administrative support such as account creation, security, and responding to issues; and,
- provide you with industry information, surveys, information about our awards and events, offers and promotions, related to the products and/or services.

Legitimate interests: where it is necessary for purposes which are in our, or third parties, legitimate interests. These interests are:

- providing you with newsletters, surveys, information about our qualifications and events, offers and promotions, which may be of interest to you;
- communicating with you in relation to any issues, complaints, or disputes;
- improving the quality of experience when you interact with our products and/or services, including testing the performance and customer experience of our Website and/or our Moodle VLE;
- performing analytics on take up information to determine the effectiveness of promotional campaigns.

NOTE: you have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading Your Rights.

Where required by law: we may also process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

We may use your personal data, including images and video of you, in our promotional activities where you have given your consent for us to do so.

Who do we share your personal data with?

We take all reasonable steps to ensure that our staff protect your personal data and are

aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

We may also share your personal data with trusted third parties including:

- legal and other professional advisers, consultants, and professional experts;
- service providers contracted to us in connection with provision of the products and services such as providers of IT services and customer relationship management services; and
- analytics and search engine providers that assist us in the improvement and optimisation of our Website.

We will ensure there is a contract in place with the categories of recipients listed above which includes obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

Where a third-party recipient is located outside the European Economic Area, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission where the data protection authority does not believe that the third country has adequate data protection laws.

We will share personal data with law enforcement or other authorities if required by applicable law.

How long will we keep your personal data?

If you are or become a learner with CV College, we will retain personal data relating to your learning, assessment and certification, our quality assurance processes, appeals, or investigations for a period of 6 years to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities.

Where there is a contract between us, we will retain your personal data for the duration of the contract, and for a period of 6 years following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements or any orders from competent courts or authorities.

Where do we store your personal data and how is it protected?

CV College stores data held in hard copy at its head office and that held digitally in a UK data centre within a secure and continually monitored facility. Some personal data is also held by CV College field staff, where this is necessary for them to perform their duties in respect of current and potential learners. We take reasonable steps to protect your personal data from loss or destruction, including training all of our staff on CV College data protection policies and practices. We also have procedures in place to deal with any suspected data security breach. We will notify you and the Information Commissioners Office (ICO) of a suspected data security breach where we are legally required to do so.

Where you have a username or password (or other identification information) which enables you to access certain services or parts of our Website or other on-line services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Website or other on-line services; any transmission is at your own risk. Once we have received your personal data,

we will use strict procedures and security features to try to prevent unauthorised access.

Your rights

Under the GDPR, you have various rights with respect to our use of your personal data, as follows:

Right to be informed

You have the right to be informed about the collection and use of your personal data. This is a key transparency requirement under the GDPR. CV College will provide you with information including: our purposes for processing your personal data, our retention periods for that personal data and who it will be shared with. We will do this through our Privacy Policies and Notices.

Right to Access

You have the right to request a copy of the personal data that we hold about you by contacting us using the contact details provided below. Please include with your request information that will enable us to verify your identity. We will respond within 1 month of the request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information, or if there is no basis for your request, or if it is excessive.

Right to Rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.

Right to Erasure

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

Right to Object

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data or if your data is being processed for direct marketing purposes. If you would like to object to the processing of your personal data, please contact us using the contact details provided below.

Right to Restrict Processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have queried the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests or the processing is

unlawful and you elect that processing is restricted rather than deleted. If you wish to exercise this right please contact us using the contact details provided below.

Right to Data Portability

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to make such request, please contact us using the contact details provided below.

Rights in Relation to Automated Decision Making and Profiling

CV College does not engage in automated individual decision-making (making a decision solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain things about an individual). If we did undertake such processing, individuals would have the rights to have information about the processing and to request human intervention or challenge decisions and we would have to carry out regular checks to make sure that our systems were working as intended.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

Contact

If you have any queries about this Notice, the way in which CV College processes personal data or would like to exercise any of your rights, set out above, please contact our Data Protection Officer:

- by clicking [here](#) and completing a request;
- by sending an email to dpo@cvcollege.org; or,
- by writing to the Data Protection Officer, CV College, 3 Archipelago, Lyon Way, Camberley, Surrey, GU16 7ER.

Complaints

If you believe that your data protection rights may have been breached and we have been unable to resolve your concern, you may lodge a complaint with the applicable supervisory authority or seek a remedy through the courts. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

Changes to our Policies

Any changes we may make to our Notice in the future will be posted on this page and where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Notice.