

BHR CEPN Training Hub Privacy Notice

1. Who we are

We are the BHR Community Education Provider Network (CEPN) Training Hub, a network which co-ordinates primary, social, and secondary care education and training across the Barking & Dagenham, Havering and Redbridge borough footprint. We work with both the workforce and training providers to develop, source and commission integrated training that both meets your needs as an individual within your sector and meets the needs of the health and social care community as a whole.

We commission, manage, and monitor a range of different training programmes for the health and social care workforce in the three-borough footprint.

Data Controller

The BHR CEPN Training Hub is the data controller and responsible for your personal information.

We have a Data Protection Officer who oversees our handling of personal information. If you have any questions about how we collect, store, or use your information, or wish to make a request to exercise your legal rights, you can contact them at:

Name of BHR CEPN Training Hub Data Protection Officer: Paul Olaitan

Email address: info@manoravenue.co.uk

2. What information we may collect and share about you

We may collect, store, and share different types of personal information about you from/with:

- Previous, current, and prospective learners and employers.
- Business partners, contacts, associates and other trusted suppliers.

The type of personal information we hold can include:

- General information such as your name, address, contact details, date of birth, gender, and age.
- ‘Special category data’ which includes information about your racial or ethnic origin, religious beliefs, or other beliefs, physical or mental health, nationality. In job

recruitment processes that we support, we may also process information concerning any criminal offences or criminal proceedings.

- Information about your job including job title, employment history, education history and professional accreditations/qualifications.
- Information relevant to the training programme you are applying for or attending. This will depend on the programme but could include details of your job role and responsibilities or business activities.
- Information relevant to your personal circumstances to enable support.
- Information relating to your participation and progression on the programme and also the programme outcomes e.g., progress reports and personal learning records, qualifications and feedback.
- Your contact preferences.
- Technical data such as your internet protocol (IP) address, the technology you use to access our website and your profile data such as your username and encrypted national insurance number.

For suppliers, we may hold bank account and payment transaction details for services we have purchased from them.

In some circumstances, if you do not provide your personal information when requested we may not be able to provide the service or programme you have applied for.

3. How we collect your information

The BHR CEPN Training Hub may collect personal information from and about you through:

When you interact with us directly: this could be when you register for an event or training programme, sign up to our newsletter, apply for a job, visit, or create a profile on our website, respond to a customer survey or give us feedback, or otherwise get in touch by phone or electronically.

When you interact with us indirectly: through your employer, other BHR CEPN Training Hub partners, or third-party suppliers who provide a service in relation to your programme e.g., the education and training provider or Trust providing funding. This includes when managing and monitoring your training programme and achievements during the life of the programme and afterwards (for evaluation purposes) and receiving reports from the Training provider.

When you interact with our website: we may automatically collect technical data about your equipment, browsing actions and patterns to make improvements to benefit you and our visitors. This does not include any personal information and cannot be linked to you. We use “cookies” to collect this data as well as our analytics provider, Google. For more information, see our cookie policy.

When you interact with us on social media: for example, where you publicly tag us on Twitter.

4. How we use your data

We collect your personal information to be able to provide the information, services, or programmes you have applied for.

5. When we share your information with third parties

The BHR CEPN Training Hub works in partnership with a range of partners and training providers to deliver our training, education, and development programmes. We will never sell your personal data.

We may share your personal information with trusted organisations such as:

- Our funders and partners supporting our programmes, such as Health Education England, the Department for Education, Employment and Skills Funding Agency, Department of Health and Social Care, Healthy London Partnership/NHS England, North-East London Health and Care Partnership, NHS Trusts providing funding.
- The training provider associated with your programme.
- BHR CEPN Training Hub partners so that you receive information on the training and education services we can offer you.

6. Keeping your information safe

We take looking after your information very seriously and employ various physical and technical measures to protect the personal information we have under our control.

We restrict access to your information as appropriate to only those who need to know that information for the purposes set out in this Notice. Our staff receive data protection training and are required to follow our internal procedures, which cover the storage, access, and disclosure of personal information.

Our business operations are based in the UK, and we store our physical and electronic data within the UK. Our websites are hosted in the Microsoft Azure Cloud UK centre and stored on secure servers, which can only be accessed by authorised personnel, and use firewalls to block unauthorised traffic.

Unfortunately, the transmission of information over the internet is not always completely secure, and while we have done our best to protect your personal information sent to us

this way, we cannot guarantee the security of data transmitted on our website. Any transmission is therefore at your own risk. You may wish to avoid including information which you consider to be private.

We use software provided by two companies located outside of the UK for our Feedback and Stay Connected functionality on our website, who may be able to access your personal data as a result. Both companies are registered members of the Privacy Shield scheme, which ensures appropriate safeguards are in place in respect of the transfer of personal data to them. Further details of these providers can be found in our cookies policy.

Suppliers we use to provide our services are subject to a contractual relationship which includes data protection. They will only process your personal data on our instructions.

Where we have given you (or where you have chosen) a password, you are responsible for keeping this password confidential. We ask you not to share a password with anyone, and to use a password that is appropriate i.e., a mixture of upper- and lower-case letters, and characters which isn't used on other sites and isn't easily guessed.

Links to other websites

Our website contains links to third-party websites run by other organisations that we have added. If you click on those links, you may allow them to collect or share data about you. These websites will have their own privacy notice and we are not responsible for them. We would encourage you to read their privacy notice before you submit any personal data on their website.

7. How long we keep your information for

We will not retain information for longer than is reasonably necessary for the relevant purpose it was collected for and to fulfil any legal or regulatory requirements. We regularly review what information we hold and delete what is no longer required.

If you have subscribed to our newsletter, we will email you every two years asking if you wish to continue to receive it. You may opt out at any time by clicking on the unsubscribe button.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

8. Legal basis for using your information

We may process your personal information for various purposes and each purpose must have a legal ground for such processing. Our lawful basis for processing is **consent** and/or **contractual** following the ICO definitions.

We process your information:

- Where the processing is necessary to help you to access our training and development programmes e.g., for activities such as assessing your application, managing your programme, handling requests, and providing other services to you.
- Where we have an appropriate business need such as maintaining our business records or developing and improving our products and services where such business need does not harm your interests.
- Where we have a legal or regulatory obligation to use such personal information.
- Where the use is necessary to establish, exercise or defend our legal rights.
- Where you have provided your consent to our use of your personal information

With your prior consent, we also process anonymised data about your visit to our website to understand how you and other users use it so that we can improve the customer experience.

We also disclose your information to the third parties listed below for the purposes described in this Notice. These might include:

- third parties who assist in the administration and delivery of training programmes such as call handlers, project managers appointed by us, accountants, auditors, funders and other experts.
- our regulators, like Health Education England, North-East London Integrated Care Board, BHR CEPN Training Hub Board
- industry bodies
- third parties who undertake analysis for the purposes of product improvement.

9. Your rights

You have various rights of the personal information we hold about you:

1. **The right to be informed:** You have the right to be informed about the collection and use of your personal data and this privacy notice is part of the transparency requirements of data protection legislation.
2. **The right of access:** You have a right of access to the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests. Information will usually be provided in writing but if specifically requested to provide information electronically this will be done where possible.

3. **The right to rectification:** We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you do not believe this is the case, you can ask us to update or amend it.
4. **The right to erasure** (also known as the right to be forgotten): in certain circumstances, you have the right to ask us to erase your personal information. E.g., where the data is no longer required for the original purpose or where consent has been withdrawn and there is no overriding ground for continuing the processing (e.g., for compliance with national law).
5. **The right to restrict or suspend processing:** In certain circumstances you are entitled to ask us to stop using your personal information or suspend its use. The BHR CEPN Training Hub will stop processing the personal data unless there are compelling legitimate grounds for the processing, which override your interests, rights, and freedoms.
6. **The right to object to marketing:** you can ask us to stop sending you marketing messages at any time.

If you wish to exercise any of the rights, please contact our Data Protection Officer set out in this Notice.

You can also make a complaint to the Information Commissioner's Office (ICO), which is the UK supervisor authority for data protection issues. We hope that you will always raise any issues with us first and that we will be able to resolve them to your satisfaction. However, if this isn't possible then you can complain directly to the ICO if you believe that any use of your personal information is in breach of relevant data protection laws and regulations.

Information Commissioner's Office
Wycliffe House
SK9 5AF
Tel: 0303 123 1113 (local rate) or 012625 545 745 (national rate)
Email: casework@ico.org.uk
Website: www.ico.org.uk

Making a complaint will not affect any other legal rights or remedies that you have.

10. Changes to this Notice

We keep this under regular review, at a minimum on an annual basis. It was last updated in April 2023. When we make changes to this Notice, we will make this clear on our website. Please check back from time to time.