

Version number:	Status:	Owner:	Approved By:	Date Approved:	Next Review Date:
1	Approved	Paul Vincent	Will Woods	20 July 2023	1 August 2024

Student Privacy Policy

Purpose

The Open College of the Arts (OCA) needs to collect and process personal data to provide services to you as students and learners, to manage its operations effectively, and to meet legal requirements. This document sets out how we process your personal data.

Values / principles

There are seven principles of data protection as set out in the GDPR 2018 EU Regulation, which inform this and related policies:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

Scope

What this document covers

This document applies to you if you have ever applied, enrolled or registered to study with The Open College of the Arts, including:

- Undergraduate students.
- Postgraduate taught and research students.
- Students studying foundations units or short courses including micro credentials and CPD courses.

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- Students studying under partnership agreements.

NB some activities and services do not apply to all types of students or learner.

For the purposes of this Privacy Notice you may be referred to as a Student of The Open College of the Arts. This document applies to all students and learners of the OCA as listed within the Scope section.

We collect additional data for some cohorts of students and process it in different ways. If there is any processing, we undertake for a specific cohort of students it will be detailed in Appendix 3: Activities we carry out for specific cohorts of students.

If you have contacted The Open College of the Arts but not enrolled or registered for study, please see the Enquirers Privacy Notice.

Policy

1. Who we are

- 1.1. The Open College of the Arts is the data controller in relation to the processing activities described below. This means that OCA decides why and how your personal data is processed.
- 1.2. Where this policy refers to “we”, “our” or “us” below, unless it mentions otherwise, it is referring to The Open College of the Arts.
- 1.3. Please direct any queries about this policy or about the way we process your personal data to our Data Protection Officer using the contact details below.

Email: dpo@oca.ac.uk

Telephone: 01226 978330

By post: The Michael Young Arts Centre, Room 301, DMC 02, County Way, Barnsley, S70 2AG, United Kingdom

2. What data do we collect about you and how do we collect it?

2.1. Data that you give to us:

As soon as you contact us, we create a record in your name. To that record we add data that you give us when applying, enrolling or registering with OCA and throughout your studies. This includes communications between you and OCA for administrative and support purposes, and where you use the services, we

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offer or get involved in activities we organise, e.g., disability services, employability services or student consultations.

You may give us data about “special categories” of data, including your racial or ethnic origin, religious beliefs, physical or mental health, or sexual orientation.

Students who are currently or become subject to an HM Prison and Probation Service (HMPPS), or other criminal justice agency licence, Court Imposed Order or similar relevant condition/restriction imposed by a court or by an authorised body must also make OCA aware immediately of any conditions which may prevent them from fully engaging with their course and the wider college community. For more information, see the Terms and Conditions.

2.2. Data that we automatically collect:

We will automatically collect data about your participation in learning and assessment activities, your use of course units and related websites, and all forms of assessment activities including assignments and exams.

We may automatically collect some data when you browse our websites. Further information about this is given in our cookie policy.

If you use an OCA email address and other Google Workspace services associated with that email address, then we collect log data about your use of the service

We generally record telephone calls to and from our student recruitment and student support teams and monitor other communications between you and OCA. This is to, as appropriate, gain active consent, make sure that we have carried out your instructions correctly, and to help us improve our services through staff training. We will also use call recordings to investigate complaints. We track emails we send to you to see which messages have the highest response rates and whether there are messages that resonate with particular groups of people. We do this by logging whether emails we send have been opened, deleted and interacted with (for example, by clicking on links within the emails). Although we only use this information to look at general patterns, it is still personal data because it is linked to your email address.

Some of our systems and processes automatically collect personal data:

- If tutorials, other learning events or meetings are recorded, then some personal data of participants may be automatically captured.
- IT system use is logged and monitored.

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2.3. Data we receive from third parties:

We may contact the Higher Education Statistics Agency (HESA), other educational institutions, or education databases (such as your Personal Learning Record (PLR) on the Learning Records Service) to confirm the qualifications you have obtained or to check whether you have been included in a previous HESA or Individual Learner Record (ILR) return. We also receive some personal data from HESA as part of the process of reporting to HESA according to our legal obligation.

If your fees are paid via a UK funding authority or government agency, such as a loan or grant, we will receive basic data from the funding provider. If your fees are paid by another organisation, they may provide some data about you to us. Further information is available to you in the appendices of this document, your registration documents, or your funding terms and conditions.

If we have a partner organisation supporting student recruitment in a particular area, then we may receive your contact details from them, in order to provide you with information about our courses and application, enrolment or registration.

If you are studying an external course which has a collaborative credit partnership with OCA, then we will receive details about your marks and credit from the partner you have studied with.

If you are studying with an organisation whose qualifications are validated by OCA, then we will receive information about your qualification from the partner you studied with.

If you are not currently studying, we may enhance our records with data received from third parties, in order to ensure we have up to date contact details for you, and in order to offer you more relevant communications. We will only send you marketing communications if your communications preferences allow this. If you do not wish to receive these communications, you can change your communications preferences by using the information in Section 1.3.

2.4. How do we use your personal data?

We collect and process a broad range of personal data about you in order to administer your programme of study, deliver our services and support you, to manage our operations effectively, and to meet our legal requirements. Legal

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bases for collecting your data can be found in “Our legal bases for contacting you and using your personal data”.

If you do not provide us with some of the data, we need at registration then we may not be able to effectively provide administration or support services to enable you to succeed in your study. In certain circumstances, it may also lead to you being unable to enrol or register with the OCA. It is also important that you keep the information provided at registration up to date. It is your responsibility to keep your personal data accurate by submitting a [Change of Details form](#). You must notify us within a reasonable time if you change your name, the country where you are resident or ordinarily resident, or any of your contact details.

We use your “special categories” of data for activities including equal opportunities monitoring, identifying if you need support (in conjunction with other learning analytics data), informing academic research, providing you with relevant opportunities and services, and ensuring that views of students with specific protected characteristics are represented. Data that you have given us about any disabilities and special requirements you have will also be used to inform the provision of reasonable adjustments and other provisions for your study.

You may submit additional “special category” data to us, for example medical evidence for funding, data about your religion relating to special circumstances for an examination, or data pertinent to an enquiry or complaint. We only use this data for the purpose for which it was provided.

Detailed information on how we use your data is provided in Appendix 1.

We are committed to the data protection principles of good practice for handling data. All personal data is held securely, and we will only transfer data within OCA on a ‘need-to-know’ basis so that we can support our academic and other services to you.

We do not sell personal data to third parties.

2.5. Managing unwanted communications

We will contact you in connection with your experience as an OCA student or learner. We may also send you marketing information or invite you to take part in research to improve our services. If you do not wish to receive marketing or research communications, you can change your communications preferences by using the information in Section 1.3.

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2.6. Who do we share your data with?

We share data with a number of third-party organisations for specific purposes. For example:

- UCA - as the college's awarding University, employees' and students' personal and sensitive data is shared with UCA for the purposes of providing UCA-hosted services and providing data for the University's HESA submission as part of statutory requirements. Data shared between OCA and UCA is held under the latter's Data Protection Policy.
- The Open University (OU) - OU, as the college's awarding University and in preparation for becoming the awarding University, employees' and students' personal and sensitive data is shared with OU for the purposes of providing and setting up OU-hosted services and providing data for the Open University's HESA submission as part of statutory requirements. Data shared between OCA and OU is held under the latter's Data Protection Policy.
- OCA is required to share student and employee data with the Higher Education Statistics Agency (HESA), and your contact details may be passed to survey contractors to carry out the National Student Survey (NSS), other surveys of students' views about their study, and surveys of student finances. This data may be provided directly by OCA or its parent University, the University for the Creative Arts for the purposes 1 and 2 outlined in [HESA's Student Collection Notice](#).

We share data with organisations that provide funding and fee payments, for example:

- the Student Loans Company.
- national funding authorities/ government bodies e.g. Student Finance England.
- sponsor and employer organisations.

Commercial and charitable organisations that fund or collaborate with OCA on particular programmes, e.g. The Royal Photographic Society. We may disclose your data to our third-party service providers and agents for the purposes of providing services to us, or directly to you on our behalf. This includes IT service providers, online learning environments, etc. When we use third party service providers, we only disclose to them any personal data that is necessary for them to provide their service. We have a contract in place that requires them

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to keep your data secure and not to use it other than in accordance with our specific instructions.

More detailed information on who we share your personal data with is available in Appendix 2.

2.7. Other ways we may share your personal data:

We may transfer your personal data to a third party if The Open College of the Arts ceases to exist and another organisation offers to continue your study, in line with our Student Protection Plan. We may also transfer your personal data if we are under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our enquirers, visitors and students. However, we will always aim to ensure that your privacy rights continue to be protected.

2.8. Do we transfer data internationally?

Where we transfer personal data to service providers or international partners outside of the UK or the EEA, we take steps to ensure that your privacy rights are protected by using appropriate safeguards, i.e., the use of appropriate standard data protection clauses adopted by the EU Commission or the UK. Occasionally we may ask for your consent to share data outside the EEA or the UK.

Generally, data you provide to us is held securely on OCA databases, or on our cloud-based systems which are located within the UK.

2.9. Profiling and automated decision making

OCA do not undertake profiling or automated decision making. If this changed in the future, you would be notified, and this policy would be updated.

2.10. How long do we keep your personal data for?

If we collect your personal information, the length of time we keep it for is determined by a number of factors including our purpose for using the information and our legal obligations.

As an HE provider, the Open College of the Arts is required to retain data for the purposes of meeting its statutory obligations to the Higher Education Statistics Agency (HESA), Her Majesty's Revenue & Customs (HMRC), the Office for Students (OfS), and the Quality Assurance Agency (QAA). These obligations are reflected through the college's [Data Retention Schedule](#).

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2.11. Our legal basis for contacting you and using your personal data

Generally, our legal basis for processing your personal data is that it is necessary for the performance of the contract between you and the OCA (i.e. the student registration agreement), or that it is part of the OCA's public task of delivering Higher Education and vocational qualifications or Apprenticeship programmes. We have some activities that are in our legitimate interest, some activities we ask for consent to carry out, and some that we are legally obliged to undertake. Please see Appendix 1 for more information on how we use your personal data, and what our lawful bases are.

2.12. Your data subject rights

You have a number of rights in relation to your personal data, which apply in certain circumstances. In order to exercise any of these rights, please contact us using the details in this document. Your rights are described in more detail by the Information Commissioner's Office.

You have the right:

- to access the personal data, we hold about you and to receive a copy.
- to correct inaccuracies in the personal data we hold about you.
- to have your data deleted when it is no longer required

In some circumstances, you also have the right:

- to limit how we use your personal data,
- to data portability, which is the secure transfer of your personal data,
- to object to the use of your personal data.

Where we rely on consent as the legal basis on which we process your personal data, you may also withdraw that consent at any time.

Please contact us using the contact details set out above if you wish to make a request to exercise your rights. Generally, we have one month to respond to you, and there is no fee for making a request.

If you are concerned about the way we have processed your personal data, you can complain to the Information Commissioner's Office (ICO). Please visit the ICO's website for further details, or you can use their online tool for reporting concerns. <https://ico.org.uk/concerns/>

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Compliance Measurement

The college will verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the DPO (dpo@oca.ac.uk), policy owner and Senior Management Team (smt@oca.ac.uk).

Exceptions

There are no exceptions; all students and employees are covered by this policy.

Non-Compliance

Any student or employee found to be non-compliant with this policy may face repercussions, up to and including termination of enrolment or employment.

Support for the policy

For support in adhering to this policy, please refer to the college's Data Protection Officer (dpo@oca.ac.uk) or alternatively your own line manager, or other management employee for advice.

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Glossary

Data Controller

A data controller determines the purposes for which and the way any personal data are processed. In essence, this means that the data controller decides how and why personal data are processed.

Data Portability

This is the secure transfer of your personal data and is one of your rights under data protection law. You have the right to get your personal data from an organisation in a way that is accessible and machine-readable, for example as a csv file. You also have the right to ask an organisation to transfer your data to another organisation. They must do this if the transfer is, as the regulation says, “technically feasible”.

Data processing

This includes collecting, using, recording, organising, altering, disclosing, destroying or holding Personal Data in any way. Processing can be done either manually or by using automated systems such as information technology systems and “Process” and “Processing” shall be interpreted accordingly.

Legitimate interest

A justification for processing personal data set out in the UK GDPR, where the processing is necessary for the legitimate interest of the organisation or the legitimate interest of a third party.

Personal data

According to the UK GDPR, ‘personal data’ means any data relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

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Protected characteristics

There are nine characteristics protected under the Equality Act 2010. They are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Profiling

Profiling analyses aspects of an individual's personality, behaviour, interests and habits to make predictions or decisions about them. The UK GDPR defines profiling as follows: 'profiling' means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Public Task

A justification for processing personal data set out in the UK GDPR, where the processing is necessary for OCA to perform a task in the public interest, or for our official functions, set out in our Charter.

Special categories of data

The General Data Protection Regulation sets out "special categories" of data which have to be given additional protection. These comprise your racial or ethnic origin, religious beliefs, political opinions, trade union membership, genetics, biometrics (where used for ID purposes), physical or mental health, sex life and sexual orientation. Information about criminal offences or criminal proceedings are treated similarly.

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Appendix 1: How do we use your personal data?

Course administration and teaching delivery

The following data processing activities are necessary for the contract we have with you, as set out in your Registration Agreement and Conditions of Registration. They include:

- Enrolling or registering you as a student or learner and managing fee payments.
- For programmes which have an application process, determining that an applicant meets the programme entry requirements and can be offered a place on the programme.
- Administering your fee payment.
- When you register, we use an automated process to indicate whether or not you will be eligible to receive government funding. You can ask us to review this decision.
- Maintaining your student record.
- Administering your study, including your learning events and placements, and access to OCA systems.
- Managing queries (Disclosure of special category data would be via explicit consent).
- Ensuring a safe environment. If you give us any data about your current criminal convictions, or restrictions you are subject to, we will use the data to restrict your access to services where required

Some of our data processing activities are necessary for our public task, as set out in our Charter and relevant legislation. These include:

- Long term retention of student data for verification of qualifications and archival research purposes.
- Recording of study events, e.g., online tutorials and face to face tutorials.
- Processing safeguarding concerns to ensure the safety and wellbeing of our students and others and to fulfil our Prevent (counterterrorism) duty.

Activities where we ask for your consent:

- Processing dietary requirements and requirements for physical access to learning events.

Assessment and awards

Activities which are necessary for your contract to study with us:

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- Administering examinations and assessments. We may contact you via SMS with deadline reminders unless you opt out of this.
- Calculating your scores, grades and classifications.
- Module results are standardised, Computer Marked Assignments are marked via an automated process, and qualification classifications are determined via an automated calculation.

Some of our data processing activities are necessary for our public task, as set out in our Charter and relevant legislation. These include:

- Administering degree ceremonies and the publication of awards, marks and inclusion in pass lists.
- Information you provide to us about your health or religion, relating to circumstances which have impacted your study, or where you need specific exam arrangements (special circumstances, exceptional exam arrangements or discretionary postponement).
- Processing requirements for physical access to facilities.

Complaints, misconduct, fitness to practice and study casework

Activities which are necessary for your contract to study with us, or are part of our public task:

- Managing complaints, appeals, allegations of misconduct, fitness to practise and fitness to study casework.

Any “special category” information that you disclose to us for use in fitness to practise, fitness to study, or complaint cases requires your explicit consent for us to process.

Support services and proactive academic support

Activities which are necessary for your contract to study with us:

- Providing support services which are necessary for your study, e.g. IT helpdesk services, disability services, and Library resources and services.
- Providing academic support. We may also identify if you require additional support or specific services and contact you to offer support.

Activities which are part of our public task of delivering higher education qualifications:

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- Providing other support services and other facilities to you, for example enterprise support, as well as opportunities to volunteer. When you enrol or register as a student on Stage 2 and Stage 3 units, you are automatically enrolled on the Enterprise Hub unit,. This service is available to you up to three years after your last study with the OCA.
- Administering additional financial support, including medical evidence.
- Administering payments for students relating to awards, grants, donations or prizes.
- Providing reasonable adjustments for students with disabilities.

Marketing

We process your personal data as part of our public task for the following purposes:

- To send you marketing communications, if you haven't already set your OCA marketing preferences when you register or enrol to study. You are able to opt out of receiving marketing communications by using the details in Section 1.3.
- We may use media providers' services (e.g. Facebook and Google) to securely match your contact details with their user profiles, in order for you to receive relevant advertising online, or to exclude you from advertising. We may also use this to identify people like you – a “lookalike audience” – who would receive relevant OCA adverts. For more information, see how to control the ads you see on Facebook, how to control the ads you see on Google, and how Google ads work.

You can update your online marketing preference, and you can also ask us not to share your details with media providers, by using the details in Section 1.3.

- To analyse our student body to inform our marketing strategy and to enhance and personalise your customer experience.
- To verify the accuracy of data that we hold about you and create a better understanding of you as a customer.

Activities we carry out with your consent:

- We send you marketing communications about our modules, qualifications, or other services, if you set your OCA marketing preferences before you registered or enrolled as a student. You can change your marketing communications preferences at any time.
- We use cookies and similar technologies to obtain an overall view of visitor habits and volumes to our website, and to provide you with more useful and relevant adverts on our website and other websites. For more detailed information on how

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we use cookies and how to switch them off on your device, see our Privacy policy and Cookie policy.

IT, security and internal administration

Activities in our legitimate interests:

- To prevent fraud and other criminal activities, for example fraud in relation to public funding.
- To audit our activities in order to ensure regulatory compliance.
- To monitor use of IT services and ensure network and information security.
- To test and maintain our systems and to ensure robust performance.
- To help us improve our services via staff training.
- To record concerns about people at risk of being drawn into terrorism (Prevent).
- We use cookies and similar technologies to enable functionality in our websites. For more detailed information on how we use cookies and how to switch them off on your device, see our cookie policy.

Student engagement

Activities that are part of the college's public task of delivering higher education qualifications:

- We administer student engagement events, including processing travel expense claim forms.
- We may use ethnic origin, disability and other data in order to ensure that views of students with specific protected characteristics are represented, and as part of evaluation and review.
- The OCA Students' Association provides us with lists of their representatives who will be taking part in student voice activities, and where activities are organised in partnership, we will share with them relevant data.
- Photos and videos may be taken at events, and these may be shared on internal OCA websites and communications; external OCA websites; presentations by OCA staff at internal and external events; and social media. If published on social media, please note we can remove the original post, but it may have been shared by others and we will not be able to recall it. You can ask social media sites to remove individual posts.

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- Anonymised quotes will be used to inform research and as evidence for quality enhancement. They may be shared with OCA and students or in publicly shared research.

Management information, reporting and service improvement

Activities which are part of our public task of delivering qualifications and apprenticeship programmes:

- Providing statistical and management reports, for service improvement, forecasting and target setting, as well as to understand the impact of our courses and services on students. This includes predicting and reporting on student numbers.
- The data includes special categories of data for equal opportunity monitoring, to help us understand our student demographics and what factors may influence success. For example, to see if groups of people with the same characteristics such as age group, gender, location etc respond more positively than other groups to a certain type of activity.
- Improving student experiences and the quality and delivery of teaching and learning and our other services. This includes identifying curriculum needs, and carrying out academic research and scholarship, market research, and engaging students in quality enhancement activities. We will ask you for feedback when you complete learning activities, and we may also ask you to take part in specific research activities or engage outside research agencies to do so on our behalf. Funding bodies and associated inspectorates (e.g. QAA) may also contact students in order to gather feedback in relation to quality of provision.
- We use data regarding ethnic origin, disability and other special category data in order to identify groups for formal feedback and to analyse responses.
- We may also contact you to find out if you are interested in taking part in other areas of research. If you do not want to be contacted to take part in any research activities, please let us know using the details given in Section 1.3.

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Who do we share personal data with?

We share data with a number of organisations for specific purposes.

Disclosure to	Details	Basis for transfer
Higher Education statistics Agency (HESA)	Some information will be sent to the HESA for statistical analysis and to allow government agencies to carry out their statutory functions. You are advised to refer to the HESA student collection notice for further details	Public Task
Training partners	Sharing of student needs and development plans with partners including Doctoral Training Partners, Centres for Doctoral Training and Innovative Training Networks	Either necessary for the contract, or where this is not the case, public task
The Higher Education Funding Council for England (HEFCE)	Data submitted for the Research Excellence Framework (REF), and potentially the Teaching Excellence Framework (TEF)	Public Task
Worldpay	By making payment using a debit or credit card for new courses, students' sensitive card data will be shared with our E-Merchant provider, Worldpay. All payment information is securely encrypted at rest and in transit.	Legitimate Interest/Contract
Amazon Web Services (AWS)	The college uses AWS for storage of static files, as well as server and database hosting, and therefore student and employee data is shared with AWS through those services. All services and servers in use through AWS are hosted within the EU in adherence with required data protection regulations and information security standards.	Legitimate Interest
Overt Software	Overt is a hosting provider for the college's OCA Learn VLE, requiring student and employees' personal data to be shared. Overt's servers are based within the EU and are in	Legitimate Interest

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	compliance with the college's Data Protection requirements and expectations.	
Panopto	Panopto is a provider of video media hosting and capture services. Employees' and Students' first name, last name and Email Address are shared with Panopto for the provision of the service. The college's Panopto server is hosted in the EU through a separate Data Protection Agreement applying to OCA as a college within the UK or EU.	Legitimate Interest
Open Athens	this service provides students on accredited programmes of study with access to UCA's online library. Personal data including full name, college Email account, programme of study and broad location (UK or Rest of World) is shared in order to provide the service. All employees are also provided access to the UCA online library through the same means, requiring the sharing of first name, last name, college Email account and Department with Open Athens.	Legitimate Interest
Mailchimp	your data (first name, surname, Email address, Programme of Study and Student Number) will be shared with Mailchimp, a USA-hosted service which applies data protection safeguards in line with the EU's Standard Contractual Clauses. Employees' first name, surname and college Email address are shared with Mailchimp for the sending of notices and to allow team members to conduct college business through the platform.	Consent
Google	The Google Workspace for Education suite of cloud-based tools, including Email, Gdrive and other online services, are provided to all	Legitimate Interest

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	employees for the fulfilment of their duties and all students at the point of enrolment. To provide these services, students' personal data, including full name and programme of study at OCA, is used to create their accounts. All student and employee data are stored within the EU.	
Padlet	a Private instance of the Padlet application, used in various Academic Departments for collaborative sharing and aggregation of research. Student and employee personal data shared includes full name and college-issued email address.	Legitimate Interest
Twilio	an SMS service which the college makes use of to centrally issue prompts or updates to students.	Legitimate Interest
Zoom.us	a Video Conferencing service which enables employees and students to meet online virtually. A separate EU Data Protection Addendum containing EU Standard Contractual Clauses for the	Legitimate Interest