



Badge Nation: Earner Personal Data and Consent to Issue Digital Badges via Credly

How does earner personal data work at Badge Nation when issuing via [Credly](#)?

Issuing badges requires Badge Nation members (Issuers) to input an earner's Personal Identifiable Information (PII) to Credly to generate an email notification and invite for the earner to accept the badge. The PII required is first name, last name, and email address. Inputting this to Credly represents an international data transfer as Credly uses US servers.

To issue digital badges Issuers must be, or be acting on behalf of, a data controller for this PII and be able to process this information on Credly with a lawful basis - consent or legitimate interest being the most commonly used.

Issuers are responsible for obtaining and demonstrating their own lawful basis for processing the PII of any earners they wish to issue badges to in order to pass this data to the Credly platform for processing. [More information on lawful basis for processing can be found on the Information Commissioner's Office \(ICO\) website here.](#)

When issuing a digital badge, Issuers input earner PII to Credly who become a data processor for this information. This represents an international data transfer and is covered by the Standard Contractual Clauses contained in Annex 2 of [Credly's GDPR Data Processing Addendum which can be found here.](#)

Issuing a digital badge generates an automated email from Credly to the earner with a link to accept their badge. If they haven't done so already, at this point, Credly will invite the earner to set up their own Credly profile and will gather some additional information.

Credly will become a data controller for earner PII only at the point that the earner accepts their badge and sets up their own Credly profile by accepting [Credly's 'earner' terms and conditions](#) and volunteering their own data. Earners can consent to sharing their own data from aged 13 and upwards. Credly's [Privacy and cookie policy can be found here](#), their [GDPR Compliance Issuer/Earner Data Controller/Processor Status Slide here](#), their [Data Security Brief here](#), and their [Privacy Overview here](#).

Until an earner accepts their badge, it will appear on Credly as 'pending'. Credly will send a series of three automatic email reminders to the earner at 1-, 4-, and 12-days post issuance.

If the earner does not accept the invitation to sign up to Credly and has left their badge as pending for 5 months, Badge Nation will request that Credly send a final reminder email to the earner.

If the badge is still pending at 6 months, Badge Nation will request that the earner PII is deleted from Credly.

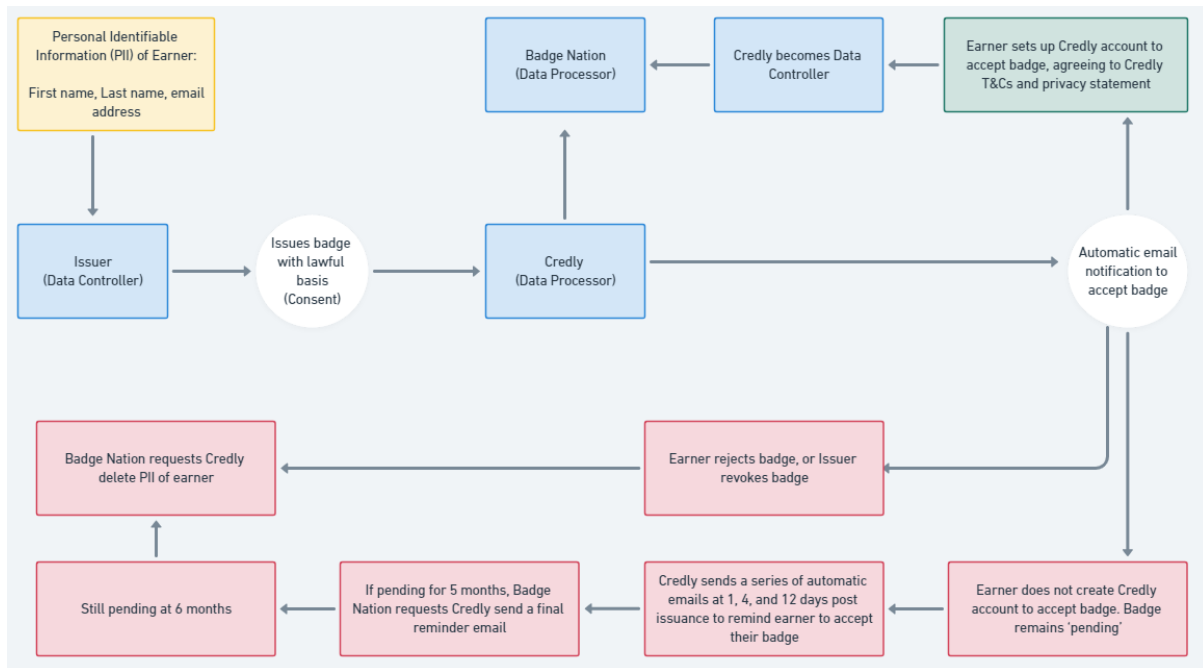
If an earner has rejected their badge, or you have had to revoke a badge, Badge Nation will request that the earner PII is deleted from Credly at the next monthly deletion request.

Badge Nation partners are data processors for earner PII (name and email address) throughout this process but will not download or process any earner data relating to Badge Nation Issuers except under the following circumstances:

- An Issuer expressly requests us to do this on their behalf.
- It is required for the delivery and monitoring of an Issuer's membership package.
- It is required as part of the process outlined above for requesting Credly to delete earner PII.

In the event that Badge Nation is required or requested to process the earner data of Issuers, the data will not be saved or stored.

Please see below flow chart to summarise the above journey for an earner's PII once you have issued them with a digital badge on Credly.



What does the process of Badge Nation deleting earner PII on Credly mean for my organisation?

If earner PII is deleted from Credly as part of our process, this means:

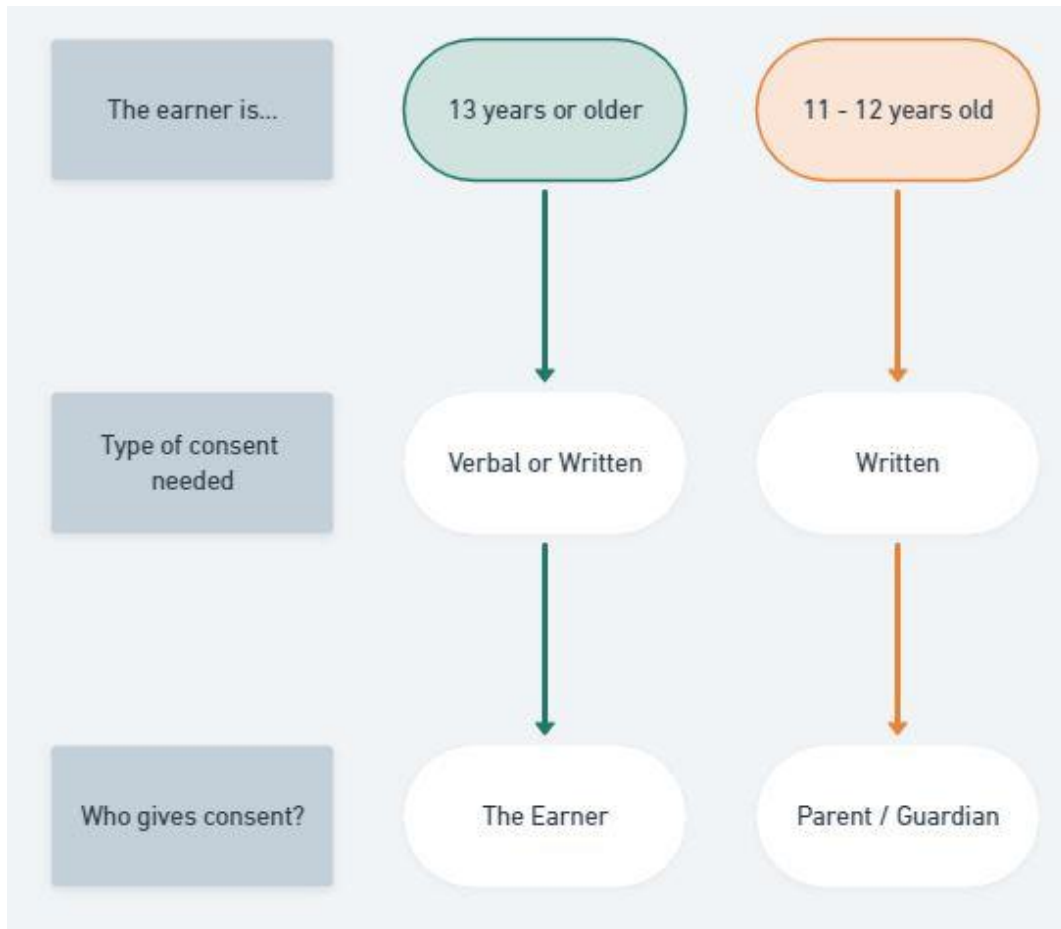
- You will lose these earners from your analytics reports.
- Your all-time analytics for badges will change as earners with 'pending' badges are removed.
- Although your acceptance rate percentage will increase, any earners that have failed to claim a badge within 6 months of issuing will lose the opportunity to go back and claim it as Credly will no longer store their data.

Higher acceptance rates are achieved when earners know they are being issued with a digital badge and are expecting the whole process to happen. There are lots of actions you can take to ensure your badges have good acceptance rates and avoid your earner PII being removed from Credly, [here are Badge Nation's top five tips to increase digital badge acceptance rates](#).

Who can I issue digital badges to, and how can I gain consent?

Whether the activity you are issuing badges for is in the past, present, or future, [it is important for Issuers to ensure they have a lawful basis for processing earner data by sharing it with Credly](#). If the lawful basis you are relying on is consent then please see the [ICO guidance on 'what is valid consent'](#) for data sharing.

Badges issued on Credly are delivered via email, so the earner will need their own email address. Whilst many 11 and 12 year olds have school email addresses, only young people aged 13 and upwards can consent to their own data sharing. More information on the sharing of children's data can be found [here](#) on the ICO website. Credly recommend having written consent from a parent or guardian in place for the sharing of any data of children aged 11 and 12.



Can I issue badges to earners under the age of 11?

We do not advocate issuing digital badges to children under the age of 11.

Can I issue badges to a parent or guardian on behalf of an earner under the age of 11?

Issuing badges to a parent or guardian on behalf of children under the age of 11 is not a practice that Badge Nation or Credly support and we do not recommend this. Please get in touch with us if this is something you were intending to do.

How can I gain written or verbal consent to issue a digital badge?



[Here is the ICO guidance on 'what is valid consent'](#). It is your responsibility as a data controller to ensure you comply with UK GDPR. Further information on how to obtain, record and manage consent can be found [here](#). Below are some practical examples of how you can gain written consent to share data to issue a digital badge.

- Write consent into the sign-up process for events, activities & programmes.

Example: Signing up to an event – Event description / Ticket listing:

*"To thank you for your involvement and recognise your XXXX (attendance/membership/engagement etc), we would like to issue with the XXXX digital badge *link*.*

Digital badges celebrate learning outside of formal qualifications and are the future of recognising skills, helping you shout about your strengths and stand out from the crowd. They are a smart, simple and visual way to share your achievements with others via your website, LinkedIn profile, CV and more.

To allow us to issue your badge we will share your name and email address with the global badge hosting platform [Credly](#). By signing up to XXXX (event/membership etc) you consent to being issued with the XXXX badge. We do this in line with our privacy notice which can be viewed [here](#).

Your badges will be a part of [Badge Nation](#) - a community of organisations committed to recognising what people achieve and accomplish outside of formal qualifications, motivating learning and ambition through digital badges. If you have any questions or concerns about being issued with a digital badge, we welcome you to contact us at XXXX (email address)"

- Create a form, tick-box or other method for earners / parents & guardians of earners to complete that indicates they are giving consent.

Example: [Real Ideas consent form](#)

XX ISSUER NAME XX is a member of [Badge Nation](#) and has embraced the use of Digital Badges to recognise and celebrate learning. Digital badges are the future of recognising skills and can help you to explain your strengths, share your achievements and stand out from the crowd.

We would like to issue you with the XX BADGE NAME & LINK XX digital badge, which highlights that you've gained skills in XXXX and verifies your attendance/engagement/membership etc.

To allow us to issue you a digital badge we need to ask for your consent to use your data with the global badge hosting platform [Credly](#). The data we will share with Credly is your name and email address. We do this in line with our privacy notice which can be viewed [here](#).

If you are happy for us to use your data to issue you with digital badges, [please provide your consent using this link](#) and we will issue you with your badge as soon as possible.