

## Virtual Learning Environment Privacy Policy

The Virtual Learning Environment (VLE) is delivered by Public Health Scotland. The VLE is a learner management system used to support learners through a variety of online learning resources and knowledge hubs. To do this we gather some personal information from our users.

We fully respect your right to privacy when using our services. Here you will find details of our privacy practices and what we do to maintain your right to privacy.

### **What information do we collect about you?**

We collect information about you and your organisation when you access the VLE. We only collect the information we ask from you, that you give us and consent to it being processed for the purpose of delivering the services of the Virtual Learning Environment.

When you create an account on Public Health Scotland's (VLE) we create a database record containing a number of pieces of personal information i.e. name, email address and organisation. Additional information is added to this record as you complete eLearning courses, such as;

- Course completions
- Quiz results
- Feedback and course submissions

Information provided to us within your user profile includes;

- Your name
- Your email address
- Your organisation and job role
- The area you live and work in
- If you are a student, which college or university you attend

## **How will we use the information we collect?**

We process your information for the purpose of providing you with services from the Virtual Learning Environment. This includes some or all of the following:

- Production of anonymized reports internally to Public Health Scotland and to the Scottish Government and COSLA. This can include things like, completion rates for courses and areas where participants are located.
- Production of identifiable reports for NHS Boards for the purposes of identifying staff completion of mandatory training.
- Contacting users to inform them of new courses, changes to the service or potential downtime.

We may also disclose the information to a third party where we have a legal obligation to do so. Public Health Scotland will not share with or sell your personal information to any other organisation.

## **How do we look after your information?**

The information we collect about you and your organisation is stored on an electronic database on a secure server hosted and maintained by a UK/EU third party and is maintained by Public Health Scotland staff.

The principles of the General Data Protection Regulation (GDPR) require us to make sure your data is accurate, kept up-to-date and that we keep it for no longer than is necessary.

To meet these requirements:

- Public Health Scotland will retain inactive accounts for no more than five years, at which point we will delete the account.
- Public Health Scotland can update and delete your account at any time upon request. You are also able to update your own account at any time using the profile options.

## **Website log files**

Using our website will generate log files of your activity. These files do not capture personal information but do capture the user's IP address. We store these log files on a secure server.

We use Google Analytics to analyse these files regularly to monitor website usage and evaluate the effectiveness of our website. We do occasionally allow trusted partners and suppliers access to our Google Analytics. This information is not personally identifiable.

We make no attempt to identify individual users of this website, unless we suspect that unauthorised access to our systems is being attempted. We reserve the right to attempt to identify and track any individual who is reasonably suspected of trying to gain unauthorised access to computer systems or resources operating as part of Public Health Scotland web services. As a condition of using this site, all users give permission for Public Health Scotland to use its access logs to attempt to track users who are reasonably suspected of gaining, or attempting to gain, unauthorised access.

## **Your rights**

Under the General Data Protection Regulation (effective from 25 May 2018), there are a number of new rights relating to Data Protection:

You have the following rights:

- 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

You can find more information about these rights on the [Information Commissioner's website](#)

## **Access to your information, changes, and complaints**

To request a copy of the information that we hold about you, correct any information that is inaccurate, unsubscribe from our services, or withdraw your consent, you can contact us by email at: [pws.wdteam@pws.scot](mailto:pws.wdteam@pws.scot)

Or write to us at:

Public Health Scotland  
Workforce Development Team  
Meridian Court  
5 Cadogan Street  
Glasgow  
G2 6QE

For enquiries about Public Health Scotland (the Data Controller) data protection practices, you can contact Duncan Robertson, Public Health Scotland's Senior Policy, Risk and Data Protection Officer by email at [duncan.robertson2@pws.scot](mailto:duncan.robertson2@pws.scot)/[pws.dataprotection@pws.scot](mailto:pws.dataprotection@pws.scot) or by phone on 0131 314 5436.

Should you wish to make a complaint about Public Health Scotland's collection or use of data, the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals is the [Information Commissioner's Office](#).