

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 while using the VLE. For more details of how Public Health Scotland uses personal data our full privacy notice is available on our website:

<https://www.publichealthscotland.scot/our-privacy-notice/organisational-background/>

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 VLE.

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 VLE. This includes some or all of the following:

- Production of anonymised 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 data protection law 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

Data protection law governs the use of personal data and, where applicable, gives you the following rights:

- The right to be informed how we use your personal data
- The right of access to your personal data
- The right to rectification of incorrect or inaccurate data about yourself
- The right to erasure of your personal data
- The right to restrict processing of your personal data
- The right to data portability
- The right to object to the processing of your personal data
- Rights in relation to automated decision making and profiling using your personal data

All the rights are qualified rights which means there are certain circumstances where they may not apply. Whenever you make a rights request to Public Health Scotland you will be advised whether or not the right applies and, if it does not apply, the reason. More information about how Public Health Scotland complies with data

protection rights can be found in the Your Rights section of our privacy notice:

<https://www.publichealthscotland.scot/our-privacy-notice/your-rights/>

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

Access to your information, changes, and complaints

To unsubscribe from our services, or withdraw your consent, you can contact us by email at: phs.wdteam@phs.scot

If you have queries, concerns or complaints, please email the Data Protection Officer at phs.dataprotection@phs.scot as this is the quickest way for us to respond to you.

Alternatively, you may write to us at:

Data Protection Officer
Public Health Scotland
Gyle Square
1 South Gyle Crescent
Edinburgh
EH12 9EB

Email address: phs.dataprotection@phs.scot

Telephone: 0131 275 6000

Our full privacy notice is available on our website:
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If you remain dissatisfied, you can make a complaint about the way we process your personal data to the Information Commissioner's Office. Details about this are on their website at www.ico.org.uk or call them on 0303 123 1113 (local rate call).