

# VLE Privacy Policy

February 2021

This policy has been created in line with the Trust's general Privacy Notice

<https://tavistockandportman.nhs.uk/about-us/contact-us/about-this-website/privacy-and-your-data>

## Purpose of Privacy Policy

The purpose of this document is to:

- provide clear information under the General Data Protection Regulation 2018 about how your data flows between Trust platforms;
- provide clear, unambiguous information about your personal data.

Our legal basis for processing your data is legitimate Interest – to allow us to manage your educational experience with us.

## Trust platforms

The Keeping Well NCL Online Training resources are provided by the Tavistock and Portman NHS Trust in partnership with North London Partners in Health and Care and Keeping Well NCL, are hosted on Moodle, the Virtual Learning Environment ('VLE') used at the Tavistock and Portman NHS Foundation Trust ('the Trust'). It is based on the open source Moodle platform (<http://www.moodle.org>). Moodle is distributed under the GNU General Public License. Our Moodle installation is externally hosted by Pearson (<https://www.pearson.com/>), a learning company that provides content, assessment and digital services to educational institutions, and CAPDM (<https://www.capdm.com/>), a specialist provider of eLearning services that help educational institutions manage online distance learning.

## Our responsibilities

The Trust and contracted third parties will deal with your personal data in accordance with the principles set out in the General Data Protection Regulation 2018. Our legal basis for processing your data is legitimate Interest - to allow us to manage your educational experience with us.

## Data we collect

When you create an account in Moodle, your username, password, first name, last name and email address are used for authentication, and your job title, North Central London organisation, details of how you heard about the course and decision to opt-in to hear more from the Tavistock and Portman NHS Trust are collected for data analysis purposes. This personal data is remains within Moodle.

## How we secure your information

Your personal data is processed under the following parameters:

- Your data is processed in the UK only;
- We will not share your data with any non-specified outside organisations, for example for the purposes of marketing;
- Your personal data (your account) will be deleted from Moodle up to two years after your learning/teaching relationship with the Trust has ended. To do this, we delete your Moodle account, which removes your complete digital footprint in the platform. Account deletions usually occur during July and August each year;

- Our platforms are role-based – this means access to your personal data by members of the Trust is based on need (e.g. only the relevant course teams and administration); Only you and authorised persons (e.g. Tavistock and Portman, Pearson, CAPDM administrators) will have access to your assessment information.
- We configure our systems and applications following industry best practice to help mitigate intrusion.
- We have clear security and privacy policies and regularly perform security awareness and privacy training for all staff.
- We maintain service level agreements (SLAs) with our third-party platform vendors. These include details of their security infrastructure, security scans and offsite backup policy.
- All platform vendors are fully GDPR compliant. Please see the separate VLE Third-party Notices.

### **Your data rights**

Depending on the lawful basis and the personal data being processed, you have the following rights to your data:

- *The right to be informed:* You can see clearly how we process your personal data and we will keep you informed if anything in this policy changes.
- *The right of access:* You can request access to your data. We will respond to these requests within one month where the requests are not complex or numerous.
- *The right to rectification:* You can request that your data be corrected (e.g. email address).
- *The right to erasure:* You can request that your data be deleted. We will first explain the implications of this.
- *The right to data portability:* You can request that your data be exported in a machine readable format to provide data portability.
- *The right to object:* You can object to us processing your data by contacting [trainkeepingwellncl@tavi-port.ac.uk](mailto:trainkeepingwellncl@tavi-port.ac.uk). Any consent given can be withdrawn at any time. The implications of this withdrawal for your relationship with the Trust will be clearly explained before proceeding.

### **Data Breach Reporting**

Any data breaches involving a risk to data subjects' rights and freedoms will be reported to the Information Commissioner's Office and the individuals affected within 72 hours of the breach being discovered.

If you have any questions about this policy or if you believe your privacy is being compromised please contact:

The Data Protection Officer,  
The Tavistock and Portman NHS Foundation Trust,  
120 Belsize Lane,  
London NW3 5BA  
Email: [dpo@tavi-port.nhs.uk](mailto:dpo@tavi-port.nhs.uk)  
Telephone: 020 8938 2022

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