Digital Academy VLE Privacy Policy

July 2020 (last updated August 2023)

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

- *DA Moodle* is the Virtual Learning Environment ('VLE') used at the Digital Academy 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 OpenLMS. (https://www.openlms.net/) a specialist elearning vendor with data centres based in the UK.

- *Shibboleth* is the authentication platform that enables the creation of accounts for enrolled students and their allocation to the appropriate study areas within Moodle. The Trust's Shibboleth platform is externally managed by Overt Software Solutions (https://www.overtsoftware.com), which has data centres based in the UK.

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 log into Moodle, your username and password are authenticated against Shibboleth, which contains your first name, last name and email address. This personal data is carried into 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 approximately three years after your last login. To do this, we delete your Moodle account, which removes your complete digital footprint in the platform. Account deletions 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. DA administration team, Digital Education Services) 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 DA T&P 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 digitalacademy@tavi-port.nhs.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 speak to a member of the Digital Education Services unit or contact:

The Data Protection Officer,
The Tavistock and Portman NHS Foundation Trust,
120 Belsize Lane,
London NW3 5BA

Email: dpo@tavi-port.nhs.uk

Telephone: 020 8938 2022

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Digital Academy
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