

LMS Privacy Notice



Oldham
Council

Date and version

1 June 2018 v1

What this privacy notice is for

Our core data protection obligations and commitments are set out in the council's primary privacy notice at www.oldham.gov.uk/dataprotection

This notice provides additional privacy information for:

- Staff who access the Council's Learning Management System (LMS)

Updating our privacy notices

We may update or revise our privacy notices at any time so please refer to the version published on our website for the most up to date details

What we use your information for

We obtain your personal information for the following purpose(s):

- To provide you with a unique username and password to access the LMS
- To be able to run reports on usage and completion of courses which may subsequently be shared internally with appropriate stakeholders
- To ensure you are given access to courses which may be bespoke to your role or Service area
- To enable you to receive notifications and confirmations from the LMS
- By collecting payroll numbers, we will in future enable the LMS to communicate with the HR system and ensure your data is kept up to date

What categories of personal information we use

Personal information can be anything that identifies and relates to a living person. This can include information that when linked with other information, allows a person to be uniquely identified. For example, this could be your name and contact details.

The law treats some types of personal information as 'special' because the information requires more protection due to its sensitivity. This information consists of:

- Racial or ethnic origin
- Sexuality and sexual life
- Religious or philosophical beliefs
- Trade union membership
- Political opinions
- Genetic and bio-metric data
- Physical or mental health
- Criminal convictions and offences

We do not collect any information which falls into the above categories for registration to the LMS. The types of personal information we collect are listed in the table below:

Category of personal data	Special/ Sensitive
Forename	NO
Surname	NO
Directorate	NO
Service area	NO
Payroll Number	NO
Email address	NO

Legal basis for processing

The legal basis for processing and or sharing your personal information is:

- Necessary for the performance of a contract to which the data subject is a party.
- Necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject.
- If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (for example keeping your details up to date), or we may be prevented from complying with our legal obligations (ensuring we have the correct learning records for compliance).

Information sharing/recipients

We may share personal information about you with the following organisations

- Me Learning
 - We may need to allow Me Learning to access your profile if we have a technical problem that we cannot solve internally
 - Me Learning have administrative access to help them keep the site running smoothly and fix any technical issues remotely

We will keep your data secure

- The LMS is hosted on Amazon Web Services (AWS) which is ISO 27001 certified; all learner/administrator information is held on this platform.
- All Me Learning's information-security critical suppliers, amongst them our hosting/monitoring partner, hold a current ISO 27001 certification, even if they do not have access to the data itself.
- Backup and Disaster recovery plans are in place.

As well as information collected directly from you, we also obtain or receive information from:

- Training providers will tell us if you have attended or failed to attend a course provided by Oldham Council
- Another representative (eg manager or Business Support Officer) within your Directorate may provide your information to enable an account to be provided for you or to make amends to your existing profile

Data Transfers beyond European Economic Area

We do not transfer any of your personal information outside the European Economic Area ('EEA').

Automated Decisions

- When you take a test on the LMS following an e-learning or classroom training session, the LMS will provide your test result based on the answers you have given.
- All the decisions we make about you involve human intervention.

How long we keep your data

We will only keep your personal information for as long as the law specifies or where the law does not specify this, for the length of time determined by our business requirements.

- The Council will keep your learning records on file internally for the duration of your employment and for a period of up to 10 years after, should your contract end.
- Me Learning will have access to your information for the duration of the contract between Oldham Council and Me Learning.

Where can I get advice

More information on how to seek advice in order to exercise your rights, raise a concern or complain about the handling of your personal information by the council can be found in the council's privacy notice which can be found at www.oldham.gov.uk/dataprotection