



## RCoA Privacy Policy and Acceptable Use of the CPD System

### General

This policy sets out how The Royal College of Anaesthetists (RCoA) uses and protects any information that you, as a **registered user (the “user”) of the RCoA CPD system**, give us (the RCoA) when you use the website or web application located at [www.cpd.rcoa.ac.uk](http://www.cpd.rcoa.ac.uk). It also sets out acceptable terms of use for the website or web application (i.e. the RCoA CPD system).

The RCoA is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website; you can be assured that it will only be used in accordance with this policy.

### What we collect

There are areas within this website which may require you to actively submit information in order for you to benefit from specific features. At each point, you will be prompted to provide the information required to complete the task. This information may be personal (i.e. information that could be used to personally identify you), such as your full name, email address, GMC number and RCoA reference number.

### What we do with the information we gather

We require this information to support you with your continuing professional development via the RCoA CPD system. For example, we use cookies to help us:

- Improve functionality, for example, saving configuration settings relevant to your personal account in the RCoA CPD system
- Monitor usage of the RCoA CPD system
- Provide feedback on the performance of the RCoA CPD system.

### Security

We are committed to ensuring that your information (including records of your CPD activities) is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information that you enter into the RCoA CPD system.

### Username and password

Users of the RCoA CPD system are issued with a unique user name and password. Your obligations are to:

- Take reasonable precautions to keep your user name and password secret
- Not tell any other person your user name or password
- Take reasonable precautions to prevent anyone else from accessing the CPD system by means of your user name and password, even if you do not tell them your user name or password
- Change your password immediately if you think someone else knows your password, or should we request that you do so
- Notify us promptly of any unauthorised use of your user name or password or any other breach of security

We reserve the right to issue you with a new password if we believe someone else knows of or is accessing the RCoA CPD system using your existing password.

### Mobile web application - passcode

For users accessing the RCoA CPD system using the dedicated web application on a mobile device (e.g. phone or tablet) it is recommended that they set up a passcode to access the application. This is in addition to their normal device login code.

### End-user reports

The RCoA takes no responsibility for the accuracy of end-user reports downloaded by users based on information held in their individual CPD system accounts. These end-user reports include the End-of-Year CPD Activity Report and Personal



Development Plan. It is the responsibility of the individual user to ensure the accuracy of these reports especially if they are used for appraisal and revalidation purposes.

### Acceptable use

You must use the RCoA CPD system only for its intended purpose and only by means of the online interactive user interface made available by us.

You must not use the RCoA CPD system to transmit or upload or otherwise publish any material that: is defamatory, abusive, obscene, of a harassing nature or in any other way offensive; or infringes anyone else's copyright or other intellectual property rights; or infringes any right of privacy, confidentiality or legal privilege.

You must not use, transfer, copy, reverse engineer, create a functional specification of or reproduce any part of the RCoA CPD system (or its source HTML code), except for the purposes of using the system for its intended purpose.

You must not use any mechanism, device, software, script or routine to affect the proper functioning of the RCoA CPD system, or take any action that places an unreasonable burden or excessive load on our server(s), or negligently or knowingly infect the system with any computer programming routine (e.g. any virus, worm, time bomb, cancelbot or trojan horse) that may damage, interfere with, delay, intercept or expropriate any system, data or personal information.

### How we use cookies

A cookie is a small text file, which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets us know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, by gathering and remembering information about your preferences.

Overall, the use of cookies enables us to monitor which pages you find useful and which you do not, e.g. Google Analytics. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website and/or our web applications.

We use cookies on our site for several purposes. They allow us to identify your device uniquely and to control the login areas of the site. These cookies do not contain any personal information. They control basic functionality of the website by storing your preferences. Other cookies are used to give us feedback about the performance of our site so that we can make it as good as possible – again these do not contain personal information about you in any way.

If the cookie originates from our domain it is known as a first party cookie whereas the domains that are placed from sites other than our own are known as third party cookies. You can control whether these types of cookies are accepted by your device or not by changing the settings in your browser.

Here are some examples of how you can control these cookies in the most widely used browsers in use today.

[Managing cookies using Internet Explorer 9](#)

[Managing cookies using Chrome](#)

[Managing cookies using Firefox](#)

[Managing cookies on a Mac with the Safari browser \(OS X\)](#)

We do not recommend disabling first party cookies as they control your main preferences on the site and the log in system so your experience of our site will be affected should you choose to do this



### Web statistics

The RCoA uses log files generated by the web servers to analyse site usage and statistics but the files do not identify any personal information. Log file analysis helps RCoA understand usage patterns on the website and make improvements to the service.

### Links to other websites

The RCoA CPD system website and mobile web application may contain links and references to other websites. If you use these links to leave our site, you are no longer covered by our privacy policy and fall under the privacy policy of the third party website. Therefore, we cannot be responsible for the protection and privacy of any information you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### Confidentiality

The RCoA takes all reasonable steps to protect any information you submit via the website, in accordance with the Data Protection Act 1998. The Data Protection Act governs the collection, retention, and transmission of information held about living individuals and the rights of those individuals to see information concerning them. The Act also requires the use of appropriate security measures for the protection of personal data.

We will not distribute your personal information to third parties unless we have your permission or are required by law to do so.

If you believe that any information we are holding on you is incorrect or incomplete, please contact the RCoA as possible. We will promptly rectify any mistakes and or gaps.

### Changes to this policy

If this policy changes in any way, we will place an updated version on this page. Regularly reviewing this page ensures that you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

Last updated August 2013.

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