



GDPR guidance and information for local officers

Introduction

On 25 May 2018 the General Data Protection Regulation (GDPR) came into effect to protect and empower all EU citizens' data privacy and to reshape the way organisations approach data privacy. Essentially it is a modern set of rules designed to enable individuals to better control their personal data.

GDPR requires the BDA to be compliant in all its activities and the BDA holds data provided by members and non-members, and data given to the Association by the GDC in respect to registrants. We do not use this information for direct mailing by post or by email unless individuals have agreed to this. We keep individuals' personal data on secure systems where data permissions can be stored and maintained.

All BDA Branches, Sections, Groups, Divisions and Young Dentist Groups are acting on behalf of the BDA, and as such you do not need to be registered or have a data controller, the BDA's Data Protection Officer is the data controller. Any data collected and used by the BDA at a local level is BDA data and the BDA centrally at head office therefore needs to be looking after and storing this data.

What this means for our valued local network and local meetings:

- **Mailings lists**

Locally held mailing lists can no longer be collected, stored or mailed locally as GDPR dictates that all personal data must be held securely centrally with our Data Protection Officer having access to the data. Permissions must be obtained, with one place of data storage, so that we can continue to contact people locally or nationally.

Mailing lists are the contact details you use for telephone, email or postal dissemination of information.

If you are holding any local mailing lists with personal data, these must be destroyed.

- **Marketing and promotion**

All mailings about local events will need to use the email or postal data held centrally by the BDA.

Email

Email mailings to promote an event or webinar should be done centrally by us through our secure email system, DotDigital. We are also happy to send information such as distribution of AGM papers, change of date or venue etc.

Post

All postal mailings for marketing should be passed to a mailing house for fulfilment purposes, providing a data usage contract exists. This can be facilitated by the Local Services team. The cost would be incurred locally for both options.

Data usage

All email or postal data requested for local activities should be used and destroyed within five working days. The data will be delivered to you in a secure format. It may not be used for any other reason, than the purpose for which it was requested.

- **Websites**

Some Branches and Sections have developed good websites to help promote and fill local members in on information and upcoming events and webinars. Websites that have already been set up can still be used to provide information only, but they will no longer be able to contain data capture facilities or take bookings or payments online for events or webinars.

Data capture

Any local websites which still have data capture features, booking and payment systems should be disabled. In addition, if there are any websites that aren't being regularly maintained with up-to-date information, we ask that these are decommissioned as this gives the appearance of no current activity in the area, and often this is not the case.

Website bookings

We will continue to add all locally held events to the main BDA website – www.bda.org. Where appropriate, if an event requires a postal mailing, we can also make a flyer and hard copy booking form for your event. We are in the process of commissioning a new BDA website with an improved registration and payment system for events and webinars and this should be ready in 2022.

- **Registration systems**

Security and third party solutions

GDPR requires that data is collected and stored securely by the data owner. BDA data cannot be managed by a third party unless a data agreement is in place. Unfortunately, EventBrite and other similar systems, which some Branches and Sections used to use, will not work with us on this basis as they will only deal with individuals rather than organisations.

New booking / registration process

We now centrally deliver the booking / payment / registration process for all Branch / Section / Group / Division / Young Dentist Group events, primarily via our online booking process, as no personal data can be held any more on local systems. Our booking system can accommodate events with free entry or those that require payment, and your delegates will receive an email booking confirmation. This should alleviate some of the administrative tasks associated with organising events and webinars.

Cash payments

We request you do not take payment by cash for events. If a delegate turns up at an event without booking, please ask them to complete a booking form and we will follow up their booking and take payment after the event.

Your income

Every Branch / Section / Group / Division / Young Dentist Group has a central deposit account set up by the BDA's finance team and the income from bookings for each event goes directly into these accounts. Once the event has taken place the money will be transferred to the locally held account of the Treasurer, assuming there is a working local account. If your area has no reserves in the locally held account, or you are a newly set up area, money received can be transferred before the event if required.

Working with partners

Joint events where an external organisation is managing the registration process, such as a deanery or LDC, may still continue so long as there is a data agreement in place between us, the BDA, and the co-organiser/s. We can provide you with a template data agreement which will allow them to manage BDA data on our behalf and will request the delegate information is shared with us so that we can maintain an event record and history of this event. If the external organisation does not wish to sign a data agreement, then the event cannot be badged as a BDA event.

- **Attendance registers for face-to-face events**

We will generate and send you an electronic copy of the attendance register that you can print out on the day. This will include the Branch, Section, Group, Division or Young Dentist Group name, the title and date of the event, together with the full name, GDC number (if applicable), BDA membership number (if applicable) and space for a signature of each delegate booked. Any 'walk-ins' on the day can be handwritten at the bottom of the sheet. We ask that you send us your attendance register for each event immediately after the meeting so that we can then issue the CPD certificates for everyone.

Historical events

We also ask that you send us any attendance registers you have stored up to 10 years back as these contain personal data, so that we can store these securely in the BDA office for you and provide replacement certificates to any delegates who ask.

- **CPD certificates**

The BDA has developed an online CPD certificate process which enables delegates to download their certificate from the BDA's CPD portal after the event or webinar.

Once we have received the completed attendance register from the event, we will mark which delegates attended on our database, and then send an email to your delegates with simple instructions on how to download their certificate. Delegates will receive a link to their own personalised certificate page and this site will store all details for any BDA event or webinar they have attended – locally and nationally.

Storage and evidence for the GDC

We will then store the attendance registers and hours each delegate gained at each event for up to 10 years, as required by the GDC. If a delegate requests a replacement certificate within those 10 years, then we should be able to send them this.

"The GDC can carry out an audit at any time of any CPD cycle, and up to five years following a cycle. So you must keep your record for five years after completion of each cycle." From: General Dental Council website

A CPD certificate template will be set up which will be signed by Elise Cole, Head of Events, BDA, and which we can then generate easily with all the specific information from each local event as required by the GDC.

- **Evaluation and feedback forms**

Historical ones held locally

Ideally, all evaluation forms should be anonymous, no names, GDC/BDA numbers, so that any data captured is not recognisable personal data.

If your previous evaluation forms are anonymous, then these can be kept for as long as they are useful to you, as often they will inform your planning for future events. Best practice would be to create a report summarising the evaluation forms so that you have all the information and feedback from each event all in one place, and then you could dispose of the hard copy evaluation forms.

If your evaluation forms contain personal data, ie: names, GDC/BDA numbers or any other identifying data, then they should be securely disposed of / shredded. If the events are recent, you may find it useful to summarise the information into a report before disposal.

Current process

For face-to-face events, a feedback form will be created on SmartSurvey and a link sent out to all delegates in advance. The link will also be sent to the event organiser to display on the day/night and we will also send the link out again to attendees post event to remind them to complete the feedback in order to get their CPD certificate.

For webinars held on GoToWebinar, a feedback form is automatically launched at the end of the webinar and also in a reminder email one hour after the webinars scheduled end time. For webinars held on Zoom, a SmartSurvey link is sent out by email post webinar.

A 'Frequently Asked Questions' summary is also available to accompany this guidance.

Elise Cole, Head of Events, BDA

Sarah Rockliff, Senior Local Services Manager, BDA

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