

# 1 Training Data and Retention Policy

The Data Protection Act 2018 (DPA) and General Data Protection Regulation (GDPR) relate to the handling of all data including employee information as well as client or customer related data. All data has been obtained lawfully, unless otherwise stated has been supplied by the individual and is relevant and appropriate for its purpose. Data down into two categories: ordinary personal data and sensitive personal data or special category data. BCT takes additional steps to protect sensitive personal data.

Subject to some exceptions, legislation requires BCT to obtain explicit consent to hold and process sensitive personal data. Without this consent BCT will not be able to process this data which would for example potentially produce unfair results.

## 1.1 What personal data do we hold?

Broadly, the types of data that BCT will process about an individual will include:

### 1.1.1 Personal Details

- title, name, address and/or email address - for contact purposes;
- home and mobile phone numbers (if supplied) - for contact purposes;
- Affiliation to a bat group (if supplied)

### 1.1.2 Participation history

- previous training, conferences or other events you have attended
- correspondence with or about you, for example confirmation of a place on a course; and
- records of any non-payment of course or conference fees.

### 1.1.3 Temporarily held data

Some additional data will be held temporarily for the purposes of planning and delivering an event as well as dealing with any complaints or administrative tasks after the event (training workshop, conference, etc). This may include:

- dietary requirements
- accessibility or other special requirements
- accommodation and workshop preferences
- any other information pertinent to the event organisation

### 1.1.4 Lawful basis

BCT processes the above data under different lawful bases. Information collected to facilitate delivery of training courses or conferences will be collected under the lawful basis relating to performance of a contract Article 6.(1)b. Where we ask for special category data around dietary or accessibility requirements, we do so on the basis of consent under Article 9(2)a.

### 1.1.5 Feedback and evaluation data

Any data collected through feedback forms and any other forms of evaluation will be stored securely and anonymised. Hard copies will be shredded after inputting and any identifiable data removed.

Any results reported publicly or to other staff, partners or the public will be reported in the aggregate.

## 1.2 Data security

All data will be held securely. Hard copy data will be entered or scanned onto the computer as the preferred method of storage and will only be accessible to BCT staff with appropriate log-ons and clearance to access data. Data may also be stored online through BCT event booking system, currently Symphony and within emails. Access to these is also password protected and available only to authorised BCT staff.

The majority of courses and events organised by BCT do not involve assessment, including the Lantra accredited Arboriculture and Bats: scoping surveys for arborists. The exception is the VBRV Tra in the trainers course, where participants complete an assessment at the end of the course. The assessment materials are password protected online with access only granted to the course leaders and BCT staff involved with organising the course. Hard copies of the assessment materials, once printed, are always in the possession of one or other of the course leaders who assumes responsible for their security.

### 1.3 Data sharing

BCT will not share personal data about individuals, except:

- regarding participation in particular courses/events with the relevant partners involved in accrediting/overseeing that course/event. Currently this list includes Lantra, Natural England, Natural Resources Wales and Scottish Natural History. The data shared with these partners will be the minimum necessary and course participants will be aware of the partner's involvement before booking their place on the course.
- Within delegate packs for conference events and similar and only with the individual's express permission, obtained during the booking process.

Data will not be transferred outside the European Economic Area.

### 1.4 Data retention

BCT aims to retain data for the minimum amount of time after an event. The only data retained longer-term is that sufficient to confirm participation in particular training courses/events as and when required.

- Temporarily held data (detailed in 2.2.3) will be deleted 3-6 months after an event, to allow time for any issues arising from an event to be appropriately dealt with before cleansing the data from both the event booking programme and any spreadsheets or other documents
- Personal and participation data (detailed in 2.2.1 and 2.2.2) will be held longer-term on the computer system and may be stored within the booking system database for ease of retention, archiving and cleansing.
- Duplicate copies of information held within the event booking system will be held for up to 2 years to allow any outstanding payments to be chased efficiently and financial records to be reconciled appropriately.

For further information on how BCT processes personal data and information about your rights, please see our privacy policy at <https://www.bats.org.uk/legal/privacy-policy>