



GDDA-UK

GHANAIAN DOCTORS & DENTISTS ASSOCIATION

Data Protection, Website and Communications Policy

Need for policy

As an association, GDDA-UK interacts with its members and the wider public via the following platforms.

- GDDAUK.org and its associated messaging system
- Twitter @gddauk
- Instagram @gdda_uk
- Email via info@gddauk.org
- Facebook GDDA-UK
- GDDA newsfeed via WhatsApp
- Mailchimp - GDDAUK
- Eventbrite - Ghanaian Doctors and Dentists Association

The responsibility for these communications lies across several individuals. This policy is to outline how these platforms are to be accessed and used and what should occur if these platforms are compromised. Following these guidelines should keep us in line with GDPR regulations.

GDPR Requirements

The GDPR applies to 'personal data', which means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. Within this act, individuals have:

- The right to be informed – being told what data you hold about them and what you do with it.
- The right of access – being able to request a copy of their data you hold.
- The right to rectification – being able to have inaccurate data corrected.
- The right to erasure – being able to ask you to delete / destroy their data.
- The right to restrict processing – being able to limit the amount or type of data used.
- The right to data portability – requesting to move their data electronically to another business.
- The right to object – being able to request you stop using their data.

More information about GDPR can be found here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>



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Roles

CONTROLLER - the person who retains overall responsibility for these platforms. This person is for ensuring security across these platforms is maintained.

ADMINISTRATOR - an individual who has administrative access to all accounts. Ideally these individuals should include a trustee, the president and/or secretary of the association. In the event of the controller being unable to carry out their duties, responsibility will fall to an administrator.

USER - an individual who has access to specific platforms to enable jobs to be carried out as deemed by their roles.

DATA PROTECTION OFFICER - This can be a controller, or an administrator and they are responsible for ensuring we maintain GDPR guidelines. This person is the data controller, with everyone else with access being a processor.

- A controller determines the purposes and means of processing personal data.
- A processor is responsible for processing personal data on behalf of a controller.
- If you are a processor, the GDPR places specific legal obligations on you; for example, you are required to maintain records of personal data and processing activities. You will have legal liability if you are responsible for a breach.
- If you are a controller, you are not relieved of your obligations where a processor is involved – the GDPR places further obligations on you to ensure your contracts with processors comply with the GDPR.

1. Logins

1.1 Logins, wherever possible should be individual logins (1 login per user). Passwords for individual users should never be shared and should be changed regularly.

1.2 Where universal logins are used, these details should be available on a need to know basis, with passwords being changed every 3 months.

1.3 A log of the individual users who have password access to universal logins and personal access via individual logins should be kept by the controller, including how long people have had access for. This log should also include the individual's role and a justification for why they have access to the page (Appendix 1).

1.4 All administrators and users should be part of be executive committee or in a written contractual agreement with the association.



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1.5 All individuals with logins need to read this policy and sign it indicating their agreement with the clauses.

2.E-mails

2.1 All emails sent from the association should be sent directly through the Gmail or Mailchimp accounts. Where this has not occurred, the association email account should be copied into the thread of correspondence to ensure transparency.

2.2 On both platforms, when an individual sends an email, they should sign off as themselves. If the email is on behalf of someone else, include their name on the name below yours with the line 'on behalf of'.

2.3 Within the Gmail account, wherever possible, one person should follow up each thread to ensure continuity.

2.4 Important information and leads picked up from the emails should be communicated to the executive team for discussion via the executive WhatsApp page.

3.Social Media

3.1 The communications officer and / or controller should decide on the overall direction of content to be shared Via social medial this should be done in conversation with the local organising committee and executive team. This should be reviewed at least quarterly.

3.2 Posts from third party organisations should be discussed for their suitability before being shared via third party platforms.

4.Memberships

4.1 In line with GDPR regulations, all individuals need to opt in to receiving communications from us and for us to store their information. Therefore, in all instance's individuals should be encouraged to sign themselves up via the registration forms available on the website. This is particularly pertinent to our use of:

- Mailchimp
- WhatsApp Newsfeed
- GDDAUK.org messaging service

4.2 As the information that is needed for association members and affiliates is minimal (names and email addresses only), all other information on any form must be marked at optional. The



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justification for these optional pieces of information must be provided to each member (Appendix 2)

4.3 Individuals information should not be shared between platforms without their express consent. If an individual is on one platform and not another, they should be contacted via the platform they are registered on.

5. Phone calls and private meetings

5.1 Where phone calls and private meetings are taken on behalf of the association. Minutes of such calls and meeting should be submitted by email to the controller via info@gddauk.org to ensure transparency.

5.2 Records of phone calls and meetings can be submitted by any member of the association for work pertaining to the organisation.

6. Privacy and GDPR

6.1 GDPR gives individuals the right to have their data deleted at any point. This can be done by email to info@gddauk.org. Where someone makes an oral request or telephone request, the receiver of this information should email info@gddauk.org to inform the controller this person's details are to be removed.

6.2 In October of each year, all member of the mailing list should be emailed with the data we hold on them and given the opportunity to be deleted from the list and have all data about them removed. This email should also stipulate how we use the information stored about them.

6.3 A register of the information held about each person and a justification for holding this information should be kept for each platform.

6.4 All paper records with individual data should be digitised and paper copies destroyed.

7. Breaches

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.



7.1 A breach is any occasion where the safety of any of the systems is compromised. This includes hacking or individual passwords becoming available to those not listed on the log.

7.2 If an individual believes their password has been compromised, they should notify the data protection officer and change their password immediately. They should provide any information about the breach that they have available (Appendix 3).

7.3 If the controller feels the security has been compromised, they should discuss this with the data protection officer. Together they should decide on a plan which may include, resetting all passwords or removing all admins and users until the breach is contained.

7.4 Data breaches need be notified to the Supervising Authorities (ICO) where personal data has been breached within 72 hours providing specific details about the breach including: its nature, the approximate number of subjects affected (Article 31).

7.5 The controller must notify data subjects as quickly as possible of a breach which may affect them (article 32). If a breach is likely to result in a high risk to the rights and freedoms of individuals, the GDPR says you must inform those concerned directly and without undue delay. The individual should be informed about any steps they can take to protect themselves.

7.6 Breaches can be detected by checking the login logs on each platform. If there are any irregularities, or changes noted, this must be immediately discussed with the data protection officer and controller.

8. Association Documents

8.1 All association documents, including policies and contracts, should be saved as part of the google docs account on info@gddauk.org. This will ensure the relevant people have access at all times.

9. Review

9.1 This document should be reviewed at least annually and updated in line with new GDPR regulations.



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APPENDIX 1

Login Register

Platform name:

Individual	Type of access	Start date	End date	Role	Justification



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APPENDIX 2

Log of Data Kept

Platform	Role	Personal data stored	Way of Collection	Type of data stored	Justification
WhatsApp Twitter Instagram Facebook	One-way information dissemination	No	Self-sign-up	N/A	N/A
Mail Chimp	Mailing list for members	Yes	Self-sign-up via website	<ul style="list-style-type: none"> Title & Name Graduating year & institution Email Job title Speciality Country of residence Place of work 	<ul style="list-style-type: none"> Forms membership list allows us to send communications helps us understand the nature of our membership Helps us plan meetings and mentorship programmes accordingly allows us to target our marketing.
Mail chimp	General mailing list	Yes	Self-sign-up via website	<ul style="list-style-type: none"> Email address Name 	Allow communication
Gmail	3rd party emails	No	N/A	N/A	N/A
Eventbrite	Ticketing system for events	Yes	Self-sign-up	<ul style="list-style-type: none"> Title & Name Role DOB Current position Email address Billing address Card information 	<ul style="list-style-type: none"> Allows tickets to be purchased Issuing names on badges Understanding the spread of conference attendees seating plans at gala food options



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APPENDIX 3

Breach Notification

Platform compromised:

Individual	Type of access	Type of breach	Date notified	Damage done	Personal data compromised	Action steps

Guidance written on 11th October 2019 by S.Ahiaku (Communications Officer)

Reviewed on 13th October 2019 by A.Annan (Charity Trustee)

www.GDDAUK.org @GDDAUK info@GDDAUK.org



GHANA UK BASED
ACHIEVEMENT
AWARDS

2018

ASSOCIATION
OF THE YEAR