

POLICY

JANUARY 2025

PRIVACY POLICY



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PRIVACY POLICY

INTRODUCTION TO THIS POLICY

POLICY STATEMENT

Dental Nurse Academy is committed to protecting your personal information. We value the relationship that you have with us and respect that any information you supply is personal to you.

This Privacy Policy explains what personal information Dental Nurse Academy collects and how we use it. Please read this Privacy Policy carefully, alongside our Terms of Website Use and our Terms and Conditions of Sale. By using this website or purchasing any of our services, you agree to our terms (as amended from time to time).

We will at all times only collect and process your personal information in accordance with the Data Protection Act 1998, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and after 25 May 2018, The General Data Protection Regulation.

PURPOSE

The aim of this policy is to ensure that your personal information is protected, and to provide complete transparency regarding our approach to privacy.

STAKEHOLDERS

This policy applies to all whom come into contact with the DNA. This includes:

1. DNA staff
 - a. The Board
 - b. Senior Managers
 - c. Employees
 - d. Self Employed
 - e. Agency Staff
 - f. Volunteers
2. Job applicants
3. Learners (current and prospective)
 - a. Apprenticeship students
 - b. National Diploma students
4. Third Parties
 - a. Employers (Dental Practices) of our learners
 - b. Sub-Contractors to the DNA
 - c. Suppliers to the DNA

DEFINITIONS

GENERAL DEFINITIONS

- (i) **DNA** means the Dental Nurse Academy.
- (ii) **Employers** means the employer (Dental Practice) of an Apprentice or National Diploma student who is registered with the Dental Nurse Academy.
- (iii) **Learners** means Apprentices and National Diploma students.
- (iv) **Staff** means The Board, Senior Managers, Employees, Self Employed, Agency Staff and Volunteers acting on behalf of the Dental Nurse Academy.
- (v) **Third Parties** means Employers, Sub-Contractors to the DNA and Suppliers to the DNA

DEFINITIONS SPECIFIC TO THIS POLICY

(vi) **DPO** means Data Protection Officer

RELATED POLICIES AND ARRANGEMENTS

Related Policies:

- POL-I-3 Safeguarding and Prevent Duty Policy
- POL-I-4 Complaint Policy
- POL-I-12 Social Media and Comms Policy
- POL-I-13 Reasonable Adjustment, Fair Access, and Special Consideration Policy
- POL-I-14 Staff Induction Policy
- POL-I-16 Learner Identification Policy
- POL-I-17 Staff Recruitment Policy
- POL-I-18 Learner Recruitment Policy
- POL-I-19 Appeals Policy
- POL-I-20 Examination and Invigilation Policy
- POL-I-21 Internal QA and Verification Policy
- POL-I-23 Employer Engagement Policy
- POL-I-32 Supervision of Learners Policy
- POL-I-41 Witness Verification Policy
- POL-I-42 Recognition of Prior Learning Policy
- POL-I-43 Withdrawal, Deferral and Breaks in Learning Policy

The DNA's policies will be reviewed regularly (on an annual basis) and any identified elements which breach or risk deviation from this policy shall be removed.

LEGAL FRAMEWORK

This policy and the associated arrangements shall operate in accordance with statutory requirements.

- Data Protection Act 2018, noting that this is the UK's implementation of the General Data Protection Regulation (GDPR).

- The Privacy and Electronic Communications (EC Directive) Regulations 2003

OUR COMMITMENT

WHAT INFORMATION DO WE COLLECT?

We collect information that you provide when you create or update an account through us, when you contact us directly, either by email, over the phone, text/WhatsApp or by writing to us, when you complete and send an offline document or application form, attend a Webinar or when you interact with us on social media channels.

The information that we collect from you may include your name, address, email address, telephone number and Details Of Membership including your study details. Please note, payment information is not held by us for any longer than it takes to process your transaction. Payment information is retained securely by our card processor, Sagepay, to maintain legally required payment details.

Details Of Membership may be given to your employer or prospective employer.

In order to make sure our website is the best that it can be for those using it, we may also collect details of your IP address when you are using it. This helps us to know what browser and device our customers are using.

We use Google Analytics on this website. Google Analytics uses a set of cookies to collect information and report site usage statistics without personally identifying individual visitors to Google. '_ga', the main cookie used by Google Analytics, enables a service to distinguish one visitor from another and lasts for 2 years. Any site that implements Google Analytics, including Google services, uses the '_ga' cookie. Each '_ga' cookie is unique to the specific property, so it cannot be used to track a given user or browser across unrelated websites. The data is accessible by Google, however.

Our website contains links to the websites of organisations associated with us or the services we provide. If you follow a link to any of these websites, please note that they have their own privacy policies and we do not accept any responsibility or liability for these. Please check these policies before you submit any personal information to these websites.

HOW DO WE USE IT?

Your information is used to create your account, facilitate your visit, and help Dental Nurse Academy to better understand our members and their needs, so that we can continue to improve.

You can change your contact preferences at any time by amending your account by logging into www.dentalnurseacademy.com and changing personal settings or by emailing the Data Protection officer at dpo@dentalnurseacademy.com

We work with third parties including Sagepay (Opayo), our payment system provider, Barclays Bank and the National Examining Board for Dental Nurses. We ask that they follow the same rigorous data protection standards that we do.

We also use cookies on our website. Google Analytics uses cookies and other technologies used for analytics to help collect data that allows us to understand how you interact with our website and associated platforms. These insights allow us to both improve content and build better features that enhance your experience.

HOW LONG DO WE KEEP YOUR DATA?

We only keep your data for as long as we need it. When we no longer need it for legal reasons, we will either delete it securely or in some cases anonymise it.

'_ga', the main cookie used by Google Analytics, enables a service to distinguish one visitor from another and lasts for 2 years. You can find out more about how Google stores and manages this data on [Google's privacy policy](#).

HOW DO WE PROTECT YOUR INFORMATION?

Dental Nurse Academy does not share, sell, rent or trade your personal information to any third parties for any purpose without your prior consent. We have put in place reasonable safeguards to protect your data including encryption and password protection, limiting the number of people who have access to your data as well as operational measures designed to secure your data.

YOUR CHOICES

- You have a number of rights to your data, which includes:
- The right to access your data
- The right to rectify your data if you believe there is an error such as the spelling of your name
- The right to delete your data or restrict use
- The right to object to certain uses of your data

If you have an online account, or gave us your email during your information search or upon joining, you can easily change your details and contact preferences online at any time by logging into www.dentalnurseacademy.com and use your login username and password. Alternatively, please email the Data Protection officer at dpo@dentalnurseacademy.com.

If you had chosen to receive information from us by email but no longer wish to, you can unsubscribe by emailing dpo@dentalnurseacademy.com

If you would like to alter your personal details, or how we use them, you can sign into your account or email dpo@dentalnurseacademy.com and make any changes required. Alternatively, please contact us using the details below, and we can do so for you.

You can manage your cookies settings, including Google Analytics cookies preferences, by using the cookies preferences popup bar on this website. Once you have given your consent, by pressing the

'I **consent**' button, the bar will no longer be displayed in order to improve your user experience. On the website version of this policy, you can click here to change your cookie settings.

PROMOTION AND COMMITMENT

PROMOTING THIS POLICY

All stakeholders (defined above) are required to engage with this policy and the procedures described.

This policy is promoted via the Staff Handbook, the Student Handbook and is readily available on the DNA website at www.dentalnurseacademy.com.

GAINING COMMITMENT TO THIS POLICY

Confirmation of engagement is required by all stakeholders. Our contracts and agreements require agreement to this Policy's acceptance:

- a. Employee Contract (employees)
- b. Employer Agreement (employers i.e. dental practices)
- c. Apprenticeship Commitment Statement (Apprenticeship learners)
- d. Student terms and conditions (National Diploma learners)
- e. Sub Contracting Agreement (suppliers)

Learners and employers are made aware of the Policy on joining and have to commit to accepting the policy as a condition of joining.

All members of staff are required to attest to their having read, understood and commit to this policy.

1. Upon joining the Dental Nurse Academy, new staff members complete policies and procedures training as part of their induction. Attestation is completed via the web form
2. Each year on an annual basis, all staff members must renew their attestation via the web form.

Web form for staff attestation: www.dentalnurseacademy.com/staff-attestation-form
(staff only)

TRAINING

INITIAL TRAINING

Training on this policy is included as part of the induction process when new starters join the Dental Nurse Academy.

REFRESHER TRAINING

Training regarding this policy is repeated annually.

Training is provided for managers on this policy and the associated arrangements.

MONITORING

Any concerns raised are reviewed by the Board at Management Meetings. The Board has the responsibility to ensure that any issues are resolved promptly and effectively such that the risk of repeat-occurrences is as low as reasonably practicable.

MANAGING CONCERNS

RAISING CONCERNS

If you have any concerns about the way in which we have used your data, or would like us to remove any of the personal information we hold about you, please contact the Senior Lead in the first instance. If that person is not available, please contact the Deputy Senior Lead. In the event of neither being available please escalate to the point of escalation. Full contact details are described below for each of these individuals.

All concerns should be raised formally by email to raisingconcerns@dentalnurseacademy.com

Letters should be sent to Dental Nurse Academy, Biddenham Close House, 47 Church End, Biddenham, Bedford, MK40 4AS.

To speak to someone, please call +44 (0)20 4591 2333.

RECORDING CONCERNS

Concerns are recorded in the DNA's Policy Concerns Log, which is stored securely on our HR server. Access is restricted to this folder so that only relevant persons can access the log. It is the responsibility of the Senior Lead to record all concerns and action taken.

All log files are kept in accordance with UK law and best practice and will be deleted in the appropriate timeframe.

INVESTIGATING CONCERNS

We aim to objectively assess every concern, evaluating its severity in the context of this policy. We aim to apply common sense and judgement, and commit to deal with allegations as quickly, fairly and consistently as is reasonably practicable. Our process will always involve two (2) senior management team members in any investigation, as well as a relevant Manager as appropriate.

1. Ensure the log is completed for this concern
2. Categorise the concern level of the allegation
3. Create an initial response to the allegation
4. Ensure the full facts are presented to the investigation team
5. Seek advice from regulatory/government body if appropriate
6. Reach decision
 1. Where "no further action" is the outcome:
 1. The record log must be updated including the justification for the decision
 2. A response will be put in writing to the individual concerned
 2. Where "further enquiry" is the outcome:
 1. A schedule for review will be created to determine frequency for updates
 2. An action plan for next steps will be created
 3. The record log will be updated accordingly

RESPONSIBILITY

Responsibility for ensuring the effective implementation and operation of this policy rests with the Chief Executive. Partners and Managers will ensure that they and their staff operate within this policy and arrangements, and that all reasonable and practical steps are taken to ensure continuity plans and contingencies are in place on an ongoing basis. Each partner will ensure that:

- All staff are aware of the processes and arrangements referenced in this policy;
- Proper records are maintained.

The person responsible for monitoring the operation of the policy, including periodic departmental audits, and with responsibility for considering and taking action if any instances breach this policy is:

Paul Mustoe (contact details below)

GETTING SUPPORT OR GUIDANCE

SUPPORT

You can request full details of personal information we hold about you under the Data Protection Act 1998, or, after 25 May 2018, The General Data Protection Regulation, by contacting the Data Protection Officer. Please send a description of the information you would like to see, together with proof of your identity, to dpo@dentalnurseacademy.com.

GUIDANCE

Guidance regarding data protection can be obtained from the Information Commissioner's Officer (ICO): <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>

IMPORTANT CONTACTS

SENIOR LEAD FOR PRIVACY I.E. DATA PROTECTION OFFICER (DPO)

- Name: Rob Mustoe
- Title: Data Protection Officer & MD
- Email address: dpo@dentalnurseacademy.com
- Telephone number: 020 4591 2333

DEPUTY SENIOR LEAD FOR THIS POLICY

- Name: Demelza Mustoe
- Title: Operations Director
- Email address: demelzao@dentalnurseacademy.com
- Telephone number: 020 4591 2333

POINT OF ESCALATION

- Name: Elaine Mustoe
- Title: Course Director
- Email address: elainem@dentalnurseacademy.com
- Telephone number: 020 4591 2333

NEBDN (AWARDING BODY)

- Name: Customer support
- Email address: customersupport@nebdn.org
- Telephone number: 01772 429 917

GENERAL DENTAL COUNCIL (GDC)

- Email address (<https://www.gdc-uk.org/contact-us> - use contact form)
- Telephone number: 0207 167 6000

REVIEW

This policy is fully supported by senior management (The Board at the DNA).

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Chief Executive/MD, to ensure alignment with current GDC guidelines and educational best practices.

LAST REVIEWED

January 2025

Reviewed by: Rob Mustoe, MD



NEXT REVIEW

January 2026