**WI Data Processing Policy and Privacy Notice**

In relation to \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ WI, West Kent Federation of WIs

Dated:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

WI Data Protection /MCS Representative:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Introduction**

The WI takes the processing of Members’ personal details very seriously and does its utmost to ensure it is protected.

This document sets out what information the WI holds, why it needs to hold and process it, and how it is protected.

Where “the WI” is referenced this relates to the local WI group referenced in the heading of this document.

Where “Federation” is referenced this relates to West Kent Federation of WIs, an incorporated charity registered with the Charity Commission.

Where “NFWI” is referenced this relates to the National Federation of WIs, an incorporated charity registered with the Charity Commission.

**Context**

The WI is a membership organisation which holds personal information submitted by its members and by the public who express an interest in joining or the work of the WI.

The WI is a local group run by volunteers for its members. It is affiliated to the Federation and NFWI as part of a large charitable organisation.

As a membership organisation a contract exists between the member, her local WI, the County Federation and the National Federation.

The WI also receives requests for information at local, County and National level. At local level this is, in the main, from women wanting to join, or visit with a view to joining, the local group.

The WI may also hold additional information which enhances the contract but does not form part of it.

The WI ensures that all committee members and ordinary members are aware of their responsibilities under the Data Protection Act and take all reasonable steps to ensure the security of data held and ensure that it is appropriately processed.

**Privacy**

The WI takes the use and storage of personal data very seriously. It will only collect and store information which relates to the WI. Any information it holds will only be shared with committee members as appropriate.

The WI will never share your information with any third party without your express consent.

This Privacy and Policy Notice will be available at every meeting for members and visitors to review and will be made available on all online platforms used by the WI.

The Federation and NFWI have their own privacy notice which can be seen on the relevant website.

**When do we collect information**

The WI will collect your contact information upon joining the WI. It will also ask for your consent for any additional information it wishes to collect.

**Lawful Processing**

There are 6 lawful basis that are used under GDPR. The WI uses the following:

1. Contractual Relationship

Where it is necessary for us to process your personal information in order to fulfil the contract created by your membership.

1. Legitimate Interests

This basis is used to ensure you, as a member of the WI, are kept up to date on activities and opportunities open to you. This basis is also used where non-members contact the WI asking for more information.

1. Consent

Where you have provided your consent for the WI to use your personal data.

1. Vital Information

If you feel you would like the WI to hold medical details or an emergency contact.

**Information held, use and lawful basis**

The following will illustrate the information held, how it is used and the lawful basis for holding the information.

|  |  |  |
| --- | --- | --- |
| **Personal Information** | **Use** | **Lawful Basis** |
| *Members* |  |  |
| Name | To identify the member | Contractual |
| Address | To send information regarding their membership including WI Life, event tickets, West Kent News, etc. | Contractual |
| Telephone Number | To contact the member regarding their membership, booked events, meetings.  The WI may also use the telephone number if the member has not attended meetings or is unwell to check on their welfare. | Legitimate Interest |
| Email Address | To contact the member regarding their membership, booked events, meetings, newsletters.  To allow access to the member only sections of the NFWI Website | Legitimate Interest  Contractual |
| Date of Birth/Birthday | To celebrate the member’s birthday month and/or to celebrate a special milestone birthday. This may be with cards, flowers or recognition at a meeting. | Consent |
| Photographs | Photographs of members and events are taken and shared within the group, on websites, in newsletters or on social media. We may also share photographs in a press release. | Consent |
| Medical Conditions and Emergency Contact | Where a member has a medical condition that they feel their WI should be made aware of, this information will be held in a sealed envelope to be given to a medical professional. The emergency contact will be used in a medical emergency. | Vital Information |
| *Non-members* |  |  |
| Name, Address, Telephone Number and/or email address | Details held on non-members will vary dependent on the information they provide when making contact. This information is used to respond to a request for information or to keep them informed of future meetings and events. Information is not used for any other purpose. | Legitimate Interest |

**Storing and Security of Data**

Data may be held electronically or in hard copy.

NFWI holds a central database called Membership Communication System (MCS). This database holds all contact details for members and is used by all levels of NFWI. The details are also used by WI Enterprises to send the member magazine to all members. This database is managed within the UK and is subject to stringent security. It is only accessible by registered MCS Representatives for each local WI, Federation Representatives and National Representatives. The MCS is managed by NFWI and as such it covered by their privacy policy.

Personal data may also be held in email contact lists. A third party email management application e.g. MailChimp or similar, may be used to keep a secure mailing list of members and interested non-members. Where a mailing program is used, the WI will ensure that they are GDPR compliant and will restrict access to the program to committee members who need to send group emails.

Locally, data may be held in spreadsheet form or in paper copy. All personal details are kept secure and only shared with members of the committee of the local WI to fulfil their role in supporting the contract between the group and the member.

Where a cloud storage system is used such as Dropbox, Google Drive or OneDrive the WI will restrict access using password protection. The cloud provider will be checked for GDPR compliance but information may be stored on servers outside of the EU.

Every effort is made to ensure that personal details are secured in an appropriate manner and only shared on a need to know basis. All members given access are aware of their responsibility to maintain the confidentiality of the information.

**Storage of Consent Forms**

Consent forms will be filed and kept whilst the member is active. They will be held in an archive within the WI for 3 years following the end of the membership to ensure that they are available should an information request be received.

Consent forms will be updated on a regular basis to ensure that every member is aware of the consent held and to change or update it as they wish.

**Federation Archives**

The WI has a long history and it is important to maintain this history. Records may be passed to the Federation Archivist who will catalogue and file the records.

WIs will ensure that any information sent for archiving is sent in line with any relevant consent.

Any material sent for archiving is done so under the section 6 Public Interest lawful basis and the section 9 Archiving lawful basis.

Personal information other than name will not be used in publicly available records.

**Rights of Individuals**

Every member, lapsed member or non-member has the following rights:

Right to be Informed

This notice informs you what generic information the WI holds, how the WI stores it and what the WI do with the information the WI holds.

Right of Access

You have the right to know what information the WI holds on you. The WI will respond to requests for information within one calendar month (in line with current legislation).

Right to Rectification

You have the right to request that we correct any inaccurate information. The WI will respond to all requests within one calendar month.

Right to Erasure

You have the right to request us to erase information held on you. The WI will respond to this request within one calendar month and confirm what information the WI has erased.

Right to Object

You have the right to object if you feel any of your personal information has been used in a way that you feel is inappropriate. The WI will respond to requests within one calendar month.

The WI will endeavour to respond as quickly as possible to all requests and work with you to resolve any queries.

**Activities outside the Monthly Meeting**

If your WI runs regular outings, one-off activities and sub-groups which are in addition to the contractual monthly meeting, to protect your privacy, you may be asked to complete a short contact form which will be given to the organiser of the activity you have registered for. This contact form will only be used for the individual activity and will be destroyed once the activity has taken place. For sub-groups, the information will be held by the organiser until you are no longer a member of the sub-group. Where a contact form is not used, your contact details will be taken from the member register and passed to the organiser.

This information is required for the WI to fulfil the contract with the member for the activity or group.

If you do not wish your contact details to be passed to the organiser, you must advise one of the WI Officers at the time of booking. In this situation, it will be your responsibility to make all contact with the organiser for information regarding the activity. No responsibility is accepted by the WI for contact or information sharing about the activity.

Some sub-groups use Facebook Messenger, WhatsApp or group texts to stay in contact. If your sub-group uses one of these methods, you will be asked for your permission to be added to the group and your information shared with other group members.

**Paperwork**

The WI will use all or some of the following forms to gather and store information

* NFWI Membership Form
* Consent Form
* Event/Activity Contact Form

**Length of Storage and Destruction of Data**

As the WI is a charity and has a strong public interest with archiving and documenting the activities of the WI, the WI will not destroy minutes, records of meetings and activities, scrapbooks or other records. These records will be passed to the Federation Archivist who will register the archives ensuring that all data is held in line with the Federation Archive Data Protection Policy and Privacy Notice.

However, the WI will destroy information held about members contact details or medical details. The destruction schedule will be as follows:

|  |  |
| --- | --- |
| Financial Information | Seven years in line with legal requirements |
| Membership Forms | Immediately after entering on MCS |
| Consent Forms | Three years following the end of membership |
| Event/Activity Contact Form | Immediately after the activity/event |
| Sub-group Contact Form | Upon leaving the sub-group |
| Emergency Contact and Medical Information | Upon membership lapse |

**Updating this privacy notice**

This privacy notice will be updated periodically and be available for members and non-members to read.

If the privacy notice is updated in a way that significantly changes how we use your personal information, we will bring these changes to your attention.

**Change Log**

August 2018 – Prepared by West Kent Federation of WIs