

Data Processing Policy and Privacy Notice

In relation to _____ WI, West Sussex Federation of WIs

Dated: _____

WI Data Protection Rep: _____

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 Sussex 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 their 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 it's 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, their 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.

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 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 is in relation 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 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.

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
<i>Members</i>		
Name	To identify the member	Contractual
Address	To send information regarding their membership including WI Life, event tickets, newsletters, 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.	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	Vital Information

	be held in a sealed envelope to be given to a medical professional. The emergency contact will be used in a medical emergency.	
<i>Non-members</i>		
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 runs 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.

Personal data may also be held in email contact lists. A program such as Mailchimp 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 any program used is subject to GDPR 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.

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 Membership Forms and Consent Forms

Membership forms and 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 hold, how the WI store it and what the WI do with the information the WI hold

Right of Access

You have the right to know what information the WI hold on you. The WI will respond to requests for information within 1 calendar month.

Right to rectification

You have the right to request us to correct any inaccurate information. The WI will respond to all requests within 1 calendar month.

Right to erasure

You have the right to ask us to erase information held on you. The WI will respond to this request within 1 calendar month and confirm what information the WI have 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 1 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

The 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 the member does not wish their contact details to be passed to the organiser, they must advise one of WI Officers or your WI Data Protection Representative at the time of booking. In this situation, it will be the responsibility of the member 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, What's App 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
- Keep in Touch Form
- 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	7 years in line with legal requirements
Membership Forms	3 years following the end of membership
Consent Forms	3 years following the end of membership
Keep in Touch Form	1 year for non-joiners/upon joining for new Members
Activity Contact Form	Immediately after the activity
Sub-group Contact Form	Upon leaving the sub-group

Change Log

May 2018 – Initial Preparation by West Sussex Federation of WIs