

WEST SUSSEX FEDERATION OF WIs

BECOMING GDPR COMPLIANT

1. Data Protection Policy and Privacy Notice

Please read the attached Data Protection Policy and Privacy Notice. This should cover all information and activities. If you are happy that all your activities and data held are covered, please add the name of your WI to the top, date it and enter the name of your nominated Data Protection Representative – one committee member (preferably the MCS Rep) who is responsible for maintaining data records within your WI.

Please ensure that you adhere to the requirements and steps in this document. This is the minimum standard that each WI must adhere to.

This document is to ensure transparency of data processing and storage. It is not for committee only. You **MUST** make this available to all your members and visitors. Have a few copies available at every meeting so that people can read it. If you have a website or Facebook page, add this document to the page. This will ensure visibility and transparency.

2. Consent Form

There are two consent forms.

- With Birthdays – if your WI celebrates birthdays in any way, please use this form.
- Without Birthdays – if your WI does not celebrate birthdays in a formal way, please use this form.

The consent form covers the taking and storage of photographs, the different uses for photographs. It also covers press releases. A press release is any submission to a magazine or newspaper containing details of your members or photographs of your members. It includes any articles that you send to the Federation for West Sussex News or send to NFWI for WI Life as well as the local paper, parish magazine, etc.

You **MUST NOT** include any member in any of the activities listed on the consent form unless you have their explicit agreement on this form. If you do not have a form for a member or they have failed to complete all options, **YOU MUST** exclude them from any activities.

The consent forms should be reviewed on a regular basis. WSWFI will send a reminder each year along with the details for your Annual Meeting.

3. Notice for Members

You have a Notice for Members to explain to your members about GDPR and why you are making the changes that you need to make. Please ensure that you make this available for members or read it out to them. This will help them to understand the importance of the new requirements.

4. Presentation

You have a copy of the presentation which should help you deal with most situations.

If you have any queries, please contact the Federation Data Protection Representative, Maxine Gregory at gregorymaxine@gmail.com or 01903 778933.

GENERAL DATA PROTECTION REGULATIONS (GDPR)

From May 2018, Data Protection law has changed and GDPR has come into force.

This change affects every organisation including the WI. It means that we must be even more transparent with your information and have your explicit consent for some things. You may have had letters or emails from other organisations that you belong to asking you to confirm your agreement to stay on their mailing list.

A lot of what the WI does is covered by your contract with us as we are a membership organisation and we do not share your information with any third parties.

However, there are some extra things that we do that aren't explicitly covered under your membership contract. We have to ask you to say formally that you do or don't want us to hold and/or use some personal data.

This includes taking and using photographs, celebrating birthdays and using your name or photograph in articles in West Sussex News, WI Life or local newspapers or magazines.

Up to now, we have been able to use something called "Presumed Consent". For example, if you put your contact details on a sign up sheet, we could assume that because you had written it down, you were happy for us to use it. We are not allowed to do this anymore.

We need to ask everyone to sign a consent form which clearly asks you to say yes or no to consent to a number of activities.

Unfortunately under the new regulations, we have to prove that we have your consent rather than you just saying that it is ok.

Whilst we know that this seems like overkill and totally unnecessary for the WI, the law does not discriminate between the size or type of organisation.

If we fail to comply with the new law, it is possible that individual WIs may run the risk of being fined by the Information Commissioners Office who are the regulating body.

So could we please ask for everyone's help in getting the forms signed and updating our records.

Thank you

Data Processing Policy and Privacy Notice

In relation to _____ WI, West Sussex 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 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 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.
2. **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.
3. **Consent**
Where you have provided your consent for the WI to use your personal data.
4. **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
<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. 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	Vital Information

	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 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. 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 they are GDPR compliant and will restrict access to the program to committee members who need to send group emails. Please speak to your Data Protection Rep for further details.

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

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 you do not wish your contact details to be passed to the organiser, you must advise one of the WI Officers or your WI Data Protection Representative 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
- 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	Seven years in line with legal requirements
Membership Forms	Immediately after entering on MCS
Consent Forms	Three years following the end of membership
Keep in Touch Form (if used)	One 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
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 – Initial Preparation by West Sussex Federation of WIs

CONSENT FORM

WI, West Sussex Federation of WIs

Name: _____

As part of your membership of the WI, we will store and use your name, address, telephone number and email address to fulfil the contract that is created and to keep you informed of WI events locally and at Federation and National level. We will protect your data - full details can be found in the WI Data Protection Policy and Privacy Notice.

In addition, we would like to undertake the following activities. Please indicate if you consent or do not consent to each activity then sign and date the bottom of the form.

PHOTOGRAPHS

The WI would like to take photographs of its members and the activities and events that members are involved in:

Are you happy for us to take your photograph? Yes No

Are you happy for us to use your photograph:

- in internal documents within our own WI (scrapbook/newsletters)? Yes No
- on social media (Facebook, Website, Twitter)? Yes No
- in press releases (West Sussex News, WI Life, local media)? Yes No

PRESS RELEASES

The WI likes to promote its activities.

Are you happy to be included in a Press Release:

- For a WI publication – West Sussex News, WI Life? Yes No
- For a local newspaper or magazine? Yes No
- On social media (Facebook, Website, Twitter)? Yes No

Signed: _____

Date: _____



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- on social media (Facebook, Website, Twitter)? Yes No
- in press releases (West Sussex News, WI Life, local media)? Yes No

BIRTHDAYS

The WI likes to celebrate our members' birthdays.

Are you happy to provide your date of birth for this purpose? Yes No

Are you happy to provide your month of birth for this purpose? Yes No

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The WI likes to promote its activities.

Are you happy to be included in a Press Release:

- For a WI publication – West Sussex News, WI Life? Yes No
- For a local newspaper or magazine? Yes No
- On social media (Facebook, Website, Twitter)? Yes No

Signed: _____

Date: _____



COMMITTEE CONSENT FORM

_____ WI, West Sussex Federation of WIs

Name: _____

As part of your role as a committee member there are additional activities you may take part in over and above those within the Data Protection Policy and Privacy Notice and the Consent form.

The Committee communicates regularly to manage the activities of the WI.

Are you happy for your contact details to be shared with other committee members ? Yes No

Are you happy for your contact details to be shared with other members as necessary for activities you undertake on behalf of the WI? Yes No

Are you happy for your contact details to be shared publicly as a contact for your WI? Yes No

Signed: _____

Date: _____



KEEP IN TOUCH



If you would like to be added to our mailing list please complete this form

Name:

Email:

Your details will be held securely and only used for the purpose above. You can leave the mailing list at anytime by replying to the email and requesting to leave.



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Your details will be held securely and only used for the purpose above. You can leave the mailing list at anytime by replying to the email and requesting to leave.

GDPR DO'S AND DON'TS

DO – think about your members details before sharing them. Would you like another organisation to do that with your data.

DON'T – share member details with the whole WI.

DON'T – share member details with the whole committee if they don't need them. Just because they are on the committee, if they don't contact members they don't need the list.

DO – keep any sign up lists basic with name only.

DO – if you want to collect contact details for a particular activity, use a small slip of paper with the name of the activity and ask them to fill it in and pop it in a box.

DON'T – send member details to a committee member who shares an email address. Ask them to set up a separate email even if it is just for WI business.

DO – password protect any spreadsheets – especially if someone shares a computer or you use a memory stick.

DON'T – put addresses on any literature.

DO – shred any old lists or surplus copies.

DO – get your members to sign a consent form for photos.

DO – always give a shout out before taking any photos to allow people to move out of the way.

DO – put a copy of your policy and privacy notice on your website or have copies available at your meetings.

DON'T – think it doesn't matter if you don't do this. IT DOES.

DON'T – be afraid to ask. There are no stupid questions.

THINK ABOUT

Using a cloud based storage such as Dropbox as you only then have one version of the information and you can restrict access – including removing access immediately if necessary by just changing the password. Dropbox are GDPR compliant but you will need to include it in your privacy notice

Using an email programme such as MailChimp. This means that you are not holding member emails in personal email accounts. MailChimp is GDPR compliant but you will need to include it in your privacy notice.

Moving to spreadsheets if you currently use paper as it is more secure.