

LOCKSIDE WI DATA PROTECTION POLICY

Compliance with the General Data Protection Regulation 2018 (GDPR):

The purpose of this document is to demonstrate how Lockside WI collects, handles and uses personal information for running our WI, in accordance with the GDPR regulation 2018.

The NFWI (National Federation of Women's Institute) supports WI groups to comply with the regulation through a privacy policy and guidelines. The guidelines include a number of supporting documents, e.g. • Consent guidelines • Legitimate interest assessment template • GDPR guidance for WIs and Secretaries • Revised member registration form • Data protection checklist for the Membership Communication System (MCS).

The following definition is taken from the NFWI GDPR guidance:

Personal data identifies an individual. It may include the individual's name, postal address, telephone number, financial details as well as opinions expressed about the individual. Please note that personal data also includes an identifiable person in a photograph or video material. Personal data is sensitive when it includes information about a person's ethnic background, political opinions, religious beliefs, health, sexual health and criminal proceedings or convictions.

Introduction:

Lockside WI collects and holds personal data about individuals in order to provide membership services and to operate efficiently as a WI. Individuals may consist of members of the public (including WI members), customers and suppliers. We are committed to processing data in accordance with our responsibilities under the GDPR. Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

Lawful, fair and transparent processing:

- a. This policy applies to all personal data processed by Lockside WI.
- b. To ensure that personal data is kept for no longer than necessary, Lockside WI shall put in place an archiving system for each area in which personal data is processed and review this process annually. (See Register of Systems)
- c. Individuals have the right to access their personal data and any such requests made to Lockside WI shall be dealt with in a timely manner.
- d. Lockside WI will gain consent to use members personal data through completion of the membership form. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure this.
- e. A designated person shall take responsibility for the ongoing compliance with this policy.

Security:

- a. Lockside WI shall ensure that personal data is stored securely using paper/electronic systems that is kept-up-to-date.
- b. Access to personal data shall be limited to those committee members who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

Lockside WI will ensure that we process all personal data according to our legal requirement and responsibilities. Under the GDPR this consists of at least one of the following legal grounds of consent, contractual necessity, legal obligations and legitimate interest.

Breach:

In the event of a breach of confidentiality/security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Lockside WI shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the data controller of personal data held on the MCS. The NFWI is the data controller of the personal data held on the MCS. In accordance with the Data Protection Act (1998), the NFWI is also registered with the Information Commissioner's Office (ICO). Please note that you also have the right to lodge a complaint with the Information Commissioner's Office at www.ico.org.uk/concerns.

The Federation of Women's institute website has the WI 'Privacy Policy' and 'NFWI GDPR guidance' which underpins our data protection responsibilities. This information can be found at the NFWI website.

Your rights and preferences

Lockside WI may contact you by post unless you request otherwise, and by telephone, email, social media or other electronic means depending on the communication preferences you have previously indicated. Where we rely on your consent to use your personal information, you have the right to withdraw your consent at any time. When we use your personal information, you have the right to:

- a. Ask us for **confirmation** of what personal information we hold about you, and to request a copy of that information.
- b. Request that we **delete** the personal information we hold about you, as far as we are legally required to do so
- c. Ask that we **correct** any personal information that we hold about you which you believe to be inaccurate.
- d. **Object** to the processing of your personal information where we: (i) process on the basis of the legitimate interests ground; (ii) use the personal information for direct marketing; or (iii) use the personal information for statistical purposes.
- e. Ask for the **provision** of your personal information in a computerised format to either yourself or a third party, provided that the personal information in question has been provided to us by you, and is being processed by us: (i) in reliance on your consent; or (ii) because it is necessary for the performance of a contract to which you are party; and in either instance, we are processing it using automated means.
- f. Ask for processing of your personal information to be **restricted** if there is disagreement about its accuracy or legitimate usage.

The use of personal data which is sensitive:

To ensure that Lockside WI enables equal access for all its members, we may ask for personal information which supports us to deliver activities to better meet people's needs. For example, disabilities and additional support which may be required. Any specific dietary needs, for example those based upon health and/or cultural beliefs. This information will only be shared with those members running clubs, outings or events.

Keeping personal data accurate and up to date:

Lockside members can tell us about changes to their information by either contacting us via our website at www.locksidewi.wixsite.com, sending us an email at locksidewi@gmail.com or completing an 'update my info' card at one of our meetings. On an annual basis the membership secretary will print out a copy of the personal data we hold of individual members to ensure the information we keep is still accurate.

All members of the Lockside WI Committee will adhere to the Lockside Data Protection Policy.

Date: Approved June 19th 2020.

LOCKSIDE WI REGISTER OF SYSTEMS

Data we collect:	Source of data:	How we use it:	Who we share it with:	How long we keep the data for:	Data security:
Members' personal data: Name. Date of Birth. Address. Telephone No. Email address.	New members complete a membership form which is input onto the electronic membership system. (MCS) The Membership Secretary updates and maintains the electronic members list. Paper copy is shredded <i>with the exception of finances. See below.</i> <i>(the NFWI keep personal data for 6 years after the member has left).</i> WI GDPR Consent form.	To record attendance at monthly WI meetings. Meeting rotas.	Membership Secretary. Members.	At a local level for the life time of the WI membership. Activity Clubs and ongoing events, data is archived or shredded annually.	Electronic lists password protected. Paper documents held securely.
		Attendance at activity Clubs and booking forms for events.	Club and event organisers. Members. Treasurer.		
		One off event, courses, outings. Bookings and attendance.	Event organisers. Treasurer.	Paper copy shredded within one month of event taking place.	Electronic list password protected.
		To send out monthly newsletter and other communications by post/individual email.	Newsletter organiser. Members, Committee members and Club organisers.	Lifetime of the WI membership.	A group email is sent Bcc, which gives individual email addresses.
		Social fund - Sending birthday cards/other events.	Committee members.		
		Member and visitor name badges.	Members and visitors.	One off visitor badge.	Name badges locked away.

Data we collect:	Source of data:	How we use it:	Who we share it with:	How long we keep the data for:	Data security:
Members' sensitive personal data: Ethnicity. Disability. Health.	Membership form. Booking form completed by member. WI GDPR Consent form.	To assist the committee in developing activities which offers equal opportunities and access to all members of Lockside WI.	Membership Secretary. Treasurer. Members. Club and event organisers.	Life time of the WI membership.	Electronic lists password protected. Paper documents held securely.
Members' participation data: Publicity/promotional materials such as Photographs/video.	From individual members. Through social events. WI GDPR Consent form.	To share information with our members. Local and national. Promote activities and positive outcomes.	All members. Within the public domain.		
<i>(Photographs will only be used for WI purposes and for up to a period of five years.)</i> Written articles. Opinion. Monthly newsletter.	From individual members. Through social events. Committee updates.	To promote and share information via the Lockside Facebook page.	All members. By invitation to join the facebook group only. Lockside Facebook administrators.		For Facebook use - see Facebook GDPR policy.
		To promote and share information via the Lockside website. www.locksidewi.wixsite.com	All members. Within the public domain. Website designer and administrator.		Lockside website is covered by Wix data protection policy.

Data we collect:	Source of data:	How we use it:	Who we share it with:	How long we keep the data for:	Data security:
Members' participation/other data: Satisfaction surveys and questionnaires – quantitative and qualitative data.	Individual members complete by choice and consent to take part.	To ascertain interest in specific groups, satisfaction with current provision, comments and suggestions for improvement.	Membership Secretary. The Committee planning group. Members.	Data is shredded once statistical and qualitative data has been anonymised and report generated.	Electronic lists password protected. Paper documents held securely.
Lockside Accounts: Financial transactions between members and Lockside WI: Personal contact data of members re: Correspondence between Treasurer and members. NFWI correspondence to/from Treasurer re financial management of the accounts.	Member cheque details on receipt, deposit, payment books. The Treasurer maintains a paper copy of the MCS for contacts relating to finance and bookings. Booking and payment information sent to NFWI.	To record monies paid by members for courses, outings, activities and membership subscription. Maintaining financial records of additional monies obtained from eg raffles, stalls etc. To provide accurate and up to date information regarding the general finances of Lockside WI to the NFWI.	Treasurer. Individual member. NFWI.	All information relating to financial matters is retained as integral to NFWI accounts.	Paper and electronic documents held securely by the Treasurer. Accounts seen by the Independent Financial Examiner (IFE) when accounts audited after completion of 31 December each year.

Data we collect:	Source of data:	How we use it:	Who we share it with:	How long we keep the data for:	Data security:
Lockside Committee - member data: Name. Address. Telephone No. Individual email address.	Membership form. Individual committee members.	List of committee members and roles to manage the WI group.	All members. The President, Secretary and Treasurer	Information is updated when contact information and committee roles change.	Electronic lists password protected. Paper documents held securely.
		Names of President, Secretary and Treasurer given on Lockside website as contacts for the group.	All members		
Lockside Committee business. Speaker contacts - can be name, telephone number, address, speaker subject.	Letters to and from speakers. Booking forms. Emails. Telephone calls. Information given by members.	To manage the administration and activities of the WI group.	President. Committee members. Club and event organisers.	Information about speakers is kept for five years as a resource. Updated when information changes.	Electronic lists password protected. Paper documents held securely.
Minutes of Lockside Committee meetings. Correspondence.	Generated through monthly meetings.		Minutes of meeting secretary. Committee members.	Lifetime of the Lockside WI group.	
Lockside email address.	Electronic - using the Gmail platform. locksidewi@gmail.com	To communicate with members and the public. The President and Secretary respond to any queries.	All members.	Lifetime of the Lockside WI group. Updated if email address changes.	We monitor the use of the email address.

