# **Felton and Thirston Data Protection Policy – Draft for discussion**

**Purpose of this document**

The new GDPR regulations were implemented in May 2018. The purpose of this document is to demonstrate how Felton and Thirston WI collects, handles and uses personal information for running our WI, in accordance with these new regulations.

There are documents published by National WI that provide detailed guidance. Copies of these are attached to this policy, together with our membership form:

* Attachment 1 – National WI GDPR guidance
* Attachment 2 – National WI Guidance on Sharing Photos and Videos
* Attachment 3 – Felton and Thirston WI Membership Form
* Attachment 4 – Membership renewal form
* Attachment 5 – How information is stored

**Definition of Personal Information**

The following definition is taken from the National WI GDPR guidance (Attachment 1):

*“Personal data is information that identifies an individual such as: a* ***name, postal address, telephone number, financial details*** *and any* ***opinions expressed about the individual****. A* ***photo or a video recording*** *can also constitute personal information.”*

**How do we inform individuals about our Data Protection Policy?**

We will circulate our Data Protection Policy to members when it is first published and if it is changed. We will also publish it on our web-site.

We will ensure that WI club leaders are familiar with this policy, and draw particular attention to the guidelines on using photos and videos in social media.

**Care of personal information**

*Table 1* includes a summary of the personal information held by Felton and Thirston WI and how it is used.

If anyone believes that personal information has been incorrectly handled or if there is a suspected data breach, they should report this to either the Membership Secretary or one of the Officers (President, Secretary or Treasurer) who will carry out an investigation, propose follow up actions, and report back to the Felton and Thirston Committee.

**Documents including personal information**

The following documents are used in Felton and Thirston to aid the smooth running and administration of this WI:

* **Membership Forms (see attachment 3)** – new members complete these forms when they first join. They are then given to the Membership Secretary to enter on MCS. Once the data has been entered on MCS, the original form is destroyed.
* **Annual Membership Renewal Forms –(attachment 4)** these are created by the Membership Secretary, and given to all members at the time of annual renewal. The forms are personalised for each member and contain a list of the member’s personal details held on MCS. There is a tear off slip for the member to return to confirm their details are still correct, agree if they are happy for their image to be used on our web site, and confirm the method of payment for their annual renewal.
* **Member Register** – this lists the members’ names and dates of attendance. It is used at our monthly meetings to record attendance.
* **Visitor Register** – this includes the names of all visitors and speakers, their email address, phone number, and their agreement (or not) to appear in photos or videos on our social media and web-site. The hard copy sheets will be kept in a locked cupboard and retained for a maximum of 5 years.

**Member List** – this is maintained in Excel by the Membership Secretary. The data on the Member List is: name, email address, date joined, member type (ie full or dual), a list of interests, and a record of meeting attendance. The spreadsheet is password protected, and the most recent version is shared with other committee members via the committee’s shared Outlook/Hotmail drive. If it is necessary for a committee member to print the list for a specific purpose, the hard copy should be safely destroyed (i.e. shredded or burnt) when that activity has been completed. The spreadsheet should only be downloaded to a committee member’s hard drive if absolutely necessary for a particular activity, and the file should be deleted once that activity has been completed.

**Social Media – Blogs and comments**

Felton and Thirston has a web-site:

* **Felton and Thirston web-site** - The web-site has an email contact for suggestions and comments.

**Social Media - Photos and Videos**

We often take photos and sometimes videos of members and visitors at our meetings and events to:

* Use on our web-site in articles about our activities, meetings and events.

At our meetings and clubs, we obtain permission to do this by:

* **Members** – by giving their permission on their initial membership form, and subsequently on their annual membership renewal form.
* **Visitors (including Guest Speakers)** – all visitors and speakers will be asked to sign the visitor register giving permission (or not) to be included in photos and videos on our social media and web-site.

If we run any large events, especially those including members of the public where it is not practical to obtain individual permission, we will post notices around the venue informing people that we will be taking photos/videos. We will advise that individuals should inform the photographer if they don’t wish to be included. If practical, we will also announce it at the beginning of the event.

**Membership Secretary responsibilities**

The Membership Secretary is responsible for keeping up to date with data protection legislation and any guidance from NFWI and Felton and Thirston WI.

They will follow the checklist for data protection published by National WI. The latest version was published in February 2017

The checklist also includes instructions for any change of Membership Secretary.

**Attachment 1 – National WI GDPR guidance from “My WI”**

<https://mywi.thewi.org.uk/running-your-wi/data-protection/gdpr>

**GDPR**

***Data protection law is changing – get your WI ready by 25 May 2018.***

**Introduction**

Today, more **personal information is held digitally** than ever before and it travels with ease across borders. The **General Data Protection Regulation (GDPR)** was created by the European Union to **protect and empower EU citizens’ data privacy** and to reshape the way organisations across the region approach this issue. The regulation will **apply in the UK** from **25 May 2018**. [The GDPR](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN)**replaces the Data Protection Act (1998).**Recently, the UK Government also introduced a [Data Protection Bill](https://ico.org.uk/for-organisations/data-protection-bill/) to make provisions for how GDPR applies in the UK. This document should be **read in tandem** with the GDPR.

**How does the GDPR apply to your WI?**

**WIs process personal data** about individuals in order to **provide membership services** and to operate efficiently. Personal data is information that identifies an individual such as: a **name, postal address, telephone number, financial details** and any **opinions expressed about the individual**. A **photo or a video recording** can also constitute personal information.

Special categories of personal information may include **racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical** or **mental health** and **sexual life**.

Personal data can be **stored electronically** in a file or database (e.g. the MCS) but it can also be **physically stored** in a drawer or cupboard (e.g. WI member details form).

The **current Data Protection Act (1998)** allows WIs to use personal data in line with **eight data protection principles**. They require that any personal data shall be:

1. used **fairly and lawfully**
2. used for **limited, specifically stated purposes**
3. used in a way that is **adequate, relevant and not excessive**
4. **accurate**
5. kept for **no longer than is absolutely necessary**
6. handled **according to people’s data protection rights**
7. kept **safe and secure**
8. **not transferred outside the European Economic Area** without adequate protection

In many ways, the GDPR is similar to the Data Protection Act (1998). They are both **founded on principles** that your WI must interpret **based on the type of personal data** you handle, the **level of sensitivity** of that information and the **level of risk** you are willing to take. The biggest change with the GDPR is about **transparency and accountability.**

**In other words:** Can your WI demonstrate that it understands how it is **collecting, handling, using and justifying personal information?**

To be **genuinely transparent** your WI needs to know:

* what **personal information** you hold, where it came from and who has access to it
* **why you are collecting the personal information**, by identifying the lawful basis for the processing. The three most relevant conditions for processing for WIs would be: consent, performance of a contract and legitimate interest.
* **how long** you are going to retain it for
* **who you share** it with
* to **inform the individual** of the above (and make sure this is recorded)

To be **genuinely accountable** your WI needs to demonstrate **how you comply** with the GDPR.

One of the most fundamental changes with the GDPR is **stricter requirements** for personal data that is collected based on **consent.** For example if a member gives consent for her photo to be taken, this needs to be recorded, managed and updated.

Individuals also have **eight fundamental rights** under the **GDPR**. These are:

1. **to be informed** – what data is held, how it is used, why it is used etc.
2. **access** – the data you hold on that individual
3. **rectification** – the ability to correct incorrect information
4. **erasure** – the right to be forgotten
5. **restrict processing**
6. **data portability** –to receive information from a data controller in a commonly used format, (i.e. a Word or Excel file)
7. **object**; and
8. **not to be subject to automated decision-making** including profiling

**Other changes**

If your WI receives a **request from a member t**o see their personal information (a subject access request) you need to provide this information to the member within **new timescales and requirements.**

When you carry out a **new project** you need to **make an assessment of the risks involved** with using personal information in that project.   
  
You should make sure you have the right **procedures** in place to **detect, report and investigate a data breach**. A data breach occurs if personal data is **accidentally accessed by an unauthorised person**, or if a significant set of personal data is **altered, disclosed, destroyed or lost**. For example an attendance list that is lost on a train or a member’s email address that is shared with a non-member without their consent.

The **penalty fines** for organisations that do not comply with the GDPR could reach an **upper limit of €20 million** or **4% of annual global turnover** (whichever is higher).

There will be no requirement for organisations to register with the ICO, but they will need to pay annual fee. The payment structure is yet to be determined. WIs are **generally exempt from registration** and the payment of the annual fee.

**What is the NFWI doing?**

The NFWI is here to **support WIs** in your work to ensure compliance to the GDPR. The **first step** to take is to **make sure your WI is compliant** with the current Data Protection Act (1998). The NFWI has issued guidance that is still valid (please see the resources below). Specific GDPR guidance for Federations and WIs will also be issued shortly.

We strongly encourage your WI to go through the **resources below** to get an overview of the GDPR and what you need to do to prepare for the changes. As always NFWI staff are on hand to try and help with any queries and concerns.

**Your guide to the GDPR** - General Data Protection Regulation

The **Information Commissioner’s Office (ICO)** is a UK independent authority that regulates privacy laws in the UK. They are continuously developing helpful guidance on Data Protection and the forthcoming GDPR. Some **helpful resources include**:

[Guide to Data Protection](https://ico.org.uk/for-organisations/guide-to-data-protection/)  
[Electronic Marketing](https://ico.org.uk/for-organisations/guide-to-pecr/)  
[Getting ready for the GDPR](https://ico.org.uk/for-organisations/data-protection-reform/)  
[Data Protection Bill](https://ico.org.uk/for-organisations/data-protection-bill/)

**Attachment 2 – National WI guidance on Sharing Photos and Videos from “My WI”**

<https://mywi.thewi.org.uk/running-your-wi/publicising-your-wi/sharing-photos-and-videos>

**Sharing photos and videos**

**Follow our advice for sharing photos and videos of individuals on social media.**

When taking photos and videos at WI meetings and events, it is important to obtain permission from any identifiable individuals. This is especially true if the images are intended for social media use.

**Obtaining permission**

How you obtain permission is dependent on your members. Some may wish to be asked each time and grant permission accordingly. Others may be happy to sign a one-off permission form acknowledging that photos will be taken and used on social media as and when.

The best practice would be to obtain written permission every time photos are taken. You can easily create a basic permission slip and store it at the meeting venue. Any member who has their photo taken can then sign it. This means members are able to keep track of where their photo might appear. It also ensures everyone knows their permission is being sought.

It may be easier to administer a one-off form. However, you should still ask every person present for permission again each time you take their photo. There may be some occasions when members are less keen to have their photo taken and it is always polite to double check. This also alerts them to the fact that a particular photo may be used on social media, so they know to look out for it.

**Taking photos at events**

If you are organising a large event it may not be practical to use permission forms – particularly if members of other WIs or non-members are attending.

In these cases, you may be able to place notices around the venue informing members that photographs are being taken. Notices must make it very clear that if anyone does not wish to be included in any photograph, they should alert the photographer to this effect.

Always make sure your notices are highly visible. Ideally you should also announce it at the beginning of the event.

**Example: the NFWI Centenary Annual Meeting**

At the NFWI Centenary Annual Meeting, polite notices were displayed around the venue and in the programme for the day. These let everyone know photographers would be present and that images of the day would be used extensively across online, print and broadcast media. We also ensured the photographer asked individuals for oral permission before taking their picture.

For further help or advice, including help in drafting permission forms or notices for your venue, please get in touch: [pr@nfwi.org.uk](mailto:pr@nfwi.org.uk)

**Attachment 3  
**Confidential

**WI Member Registration Form**

**For entry into the Membership Communication System (MCS)**

Please complete in **BLOCK CAPITALS**

|  |  |
| --- | --- |
| Federation: | Date Joined: / / |
| WI: |  Primary Institute   Dual Institute(s) |
| First name: | Last name: |
| Date of Birth: (optional. Only to be used to give a birthday card) |  |
| Address: | |
| Town: | Postcode: |
| County: |  |
| Telephone number(s): |  |
| Email address: (For My WI, WI Training and members information) | |
| I **do/do not** give permission for my photograph to be used on the website or for any other WI business | |

**Thank you for providing your details. We will use your details in the following ways:**

1. **To administer your membership and any responsibilities within the WI**

Your MCS Representative will upload your details to the MCS which is the central database of WI members. Your details can be accessed by us (your WI), other WIs you are a member of (Dual Members), your federation(s) and by the NFWI (collectively referred to as “the WI” here). The WI will use the details you provide in this membership form for our legitimate interests to administer your membership (and if you are an officer, a committee member or have another role, that position) as well as to send you your copy of the WI’s membership magazine, WI Life, which is sent to you by an external mailing house; and otherwise use your details in line with the NFWI’s Privacy Policy (link below).

**(2) To send you specific communications that you request**

If you subscribe to a specific newsletter such as the Public Affairs Digest we will use your details to send you the newsletter. We will always clearly communicate with you about opportunities to receive further communications and we will ask for your consent to receive these communications.

**(3) To use Digital WI services (My WI and WI Training)**

If you provide us with your email address above, you will also be able to take advantage of Digital WI services, currently My WI (https://mywi.thewi.org.uk) the dedicated website for WI members and WI Training (https://witraining.thewi.org.uk), an online training platform for WI members.

At any time, you can ask to view and amend your details. More information is available in our Privacy Policy (https://www.thewi.org.uk/privacy-policy) or via email dataprotection@nfwi.org.uk. You can also ask for a printed copy of our Privacy Policy.

**Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**WI member:** On completion please hand this form to your WI Secretary or MCS Representative.

**WI Secretary:** If your WI does not have an MCS Representative please contact your federation to find out about appointing one; alternatively pass this form to the Federation Secretary.

Please return this form to the member after it has been entered into the MCS; alternatively, please securely destroy this form.

**Attachment 4**

**Felton and Thirston WI – Membership Renewal for 2019**

To: «Firstname» «Surname»

From: Treasurer (treasurers email ?)

Date:

We are very much looking forward to your continuing membership of Felton and Thirston and a full programme of activities in 2019! These are the 2019 membership subscriptions due in January:

Full members: £42

Dual members: £20.50 to their second WI

In May 2018 the GDPR (General Data Protection Regulation) will replace the Data Protection Act. This has resulted in us reviewing our Felton and Thirston data protection policy. We are currently documenting this policy and will share it with you. Meanwhile, the immediate changes that we are implementing are:

* We are asking you to confirm that the data held about you on MCS (the WI Membership Communication System) are correct – please see your data listed below.
* We are asking for your agreement to use your name and image in photos/videos on our web-site or social media.

Please check the following data held about you on MCS, and let me know if there are any changes:

Title: «Title»

First Name: «Firstname»

Surname: «Surname»

Address: «Address1» «Address2» «Address3» «Town» «Postcode»

Telephone – Day: «TelephoneDay»

Telephone – Evening: «TelephoneEvening»

Telephone – Mobile: «TelephoneMobile»

Email address: «Email»

Type of membership: «MemberType»

**Felton and Thirston Membership Renewal 2019 – «Firstname» «Surname»**

**Please tear off this slip and return to the Treasurer at our January meeting**

1 – My MCS membership details:

|  |  |
| --- | --- |
| □ | The data held about me on MCS are correct |
| □ | The data held about me on MCS are incorrect and I have advised Ann Lings about the changes |

2 – Use of my picture in photos and videos:

|  |  |
| --- | --- |
| □ | My name or photo/video may be included on the Felton and Thirston Web-site |
| □ | I do not want my name or photo/video on the Felton and Thirston Web-site |

3 – Annual renewal payment:

|  |  |
| --- | --- |
| □ | I am paying with a cheque payable to Felton and Thirston WI |
| □ | I am paying with cash |

Signature

**Attachment 5**

**Felton and Thirston WI – Care of Personal Information held on MCS**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Data item** | **Where it came from** | **Who has access to it** | **How long is it retained** | **Why is it collected** | **Who is it shared with** | **How is the individual informed** |
| Member name | Membership Form | Membership Secretary | During their membership of the WI | To manage the WI | All members  Members may include other members’ names in social media posts, web-site articles and posts, and electronic messages (eg emails and messenger posts) between members. | Felton and Thirston Data Protection Policy |
| Member email address | As above | As above | As above | For sending emails about WI activities | Committee members  Any emails sent to groups of members will be sent bcc, except for emails between committee members which may be sent cc. | As above |
| Member address | As above | As above | As above | For entry on MCS | Felton and Thirston Officers & Social Secretary if required for specific activities | As above |
| Member phone numbers | As above | As above | As above | For contacting individual members | Felton and Thirston Officers & Social Secretary if required for specific activities | As above |
| Member interests | As Above | As above | As above | To help plan WI activities | Committee members | As above |
| Birthday | As above | As above | As Above | To celebrate your special day | Social secretary | As Above |

Information can be withdrawn at any time, please advise a member of the committee. (removal will result in the withdrawal of WI life and messages from Felton and Thirston WI