

NFWI: Data Privacy Code of Conduct for the Membership Communication System (MCS)

1. Introduction

- 1.1 The MCS plays an essential role in the administering of membership services.
- 1.2 The NFWI, federations and WIs use the MCS for, but not limited to, the following reasons:
 - 1.2.1 recording member's information
 - 1.2.2 generating reports such as reports detailing membership numbers
 - 1.2.3 contacting federations/members
 - 1.2.4 logging subscription payments
 - 1.2.5 monitoring the membership numbers
- 1.3 The NFWI also uses the MCS to administer *WI Life* Magazine and provide access to our digital services such as My WI
- 1.4 This Code of Conduct applies to every person who uses the MCS and sets out the standards of behavior the NFWI expects from all users of the MCS.
- 1.5 This Code of Conduct is to be read in conjunction with the NFWI's Privacy Policy - <https://www.thewi.org.uk/privacy-policy>

2. Privacy

- 2.1 Privacy is important when using the MCS because it contains the personal information of WI members, Judges, federation and NFWI staff and external speakers.
- 2.2 Users of the MCS should have regard to the privacy of personal information at all times.

3. Personal Information

- 3.1 Personal information is information that identifies an individual directly or is information which relates to that individual.

3.2 The MCS contains, but is not limited to, the following types of personal information:

- 3.2.1 names
- 3.2.2 addresses
- 3.2.3 email addresses
- 3.2.4 telephone numbers

3.3 The NFWI reserves the right to increase the range of personal information collected and stored on the MCS. Any such change will be in accordance with the privacy policy.

4. Special Category Information

4.1 The MCS may also contain special category information such as health data relating to whether the member receives the audio version of WI Life. However, this information is restricted and can only be accessed by NFWI staff.

4.2 MCS reps can create fields for information in the MCS and these fields may contain other types of sensitive information such as date of birth. If an MCS rep wishes to create new fields for information, this should be discussed and decided by the Committee.

4.3 Special category information generally requires explicit consent from the individual to allow processing to take place.

5. Accountability

5.1 Data protection legislation centers on the principle of accountability.

5.2 The NFWI has implemented appropriate technical and organisational measures to ensure, and be able to demonstrate, that data processing using the MCS is performed in accordance with the applicable legislation. For example:

- 5.2.1 Access to the MCS is password restricted
- 5.2.2 Passwords are hashed in the system
- 5.2.3 Users are encouraged to use different passwords for different accounts
- 5.2.4 Actions are logged in the system for audit purposes

5.3 These measures are reviewed and updated regularly.

5.4 Users of the MCS must ensure their actions are in accordance with the principle of accountability. They are expected to act responsibly and exercise sound judgment with respect to matters involving personal information on the MCS.

6. Keeping Information Accurate

6.1 It is important that records on the MCS are kept accurate at all times.

6.2 If you become aware of any inconsistencies or errors on the MCS that you are unable to edit, please inform your MCS rep, Federation or the NFWI.

7. Downloading Information

7.1 If you use the MCS to download or print information such as reports, this downloading or printing must be lawful. The downloaded or printed information should only be kept as long as necessary and should be deleted or destroyed when it is no longer needed.

7.2 You must consider where you save such information and who has access to this.

8. Deleting Records from the MCS

8.1 Employees at NFWI are responsible for permanently deleting records from the MCS.

8.2 MCS reps are able to make a member's account inactive pending deletion.

8.3 Records must be deleted from the MCS in accordance with the data retention policy and where an individual requests it (if this is legally permitted).

9. Marketing

9.1 The personal information on the MCS will only be used for marketing where the member has consented to such marketing. For example:

9.1.1 to be an Enterprises Contact

9.2 The use of personal information on the MCS for any other marketing purposes is strictly forbidden.

10. Security

- 10.1 Every user is responsible for keeping personal information held on the MCS secure.
- 10.2 MCS users should only access the MCS on a trusted device.
- 10.3 Users must not share their login details with any other person and/or permit any other person to login using their login details.
- 10.4 If you are no longer an MCS rep, hold office within a WI or are an employee of NFWI, you should not access the MCS.
- 10.5 NFWI Resources department is responsible for revoking access to the MCS.
- 10.6 If you become aware that a person is accessing the MCS when they should not be doing so, please inform the NFWI immediately.

11. Confidentiality

- 11.1 All information gained during your use of the MCS is confidential and users are expected to keep this information confidential, unless required by law not to do so.
- 11.2 You should not disclose any information to third parties without prior written consent from the NFWI.

12. Individual Rights

- 12.1 Individuals have multiple rights under data protection legislation.
- 12.2 The MCS may be used to comply with individual requests to enforce their rights under data protection legislation. Any use of the MCS for this purpose should be carried out by the WI, the Federation or the NFWI as appropriate.
- 12.3 If you become aware of an individual wishing to enforce their rights, you must notify dataprotection@nfwl.org.uk
- 12.4 It is important that any requests from individuals to enforce their rights under the data protection legislation are dealt with appropriately and in a timely manner.

13. Information Breach

- 13.1 An information breach is a security breach that leads to the unlawful or accidental: destruction, loss, alteration, unauthorised disclosure or unauthorised access to personal data transmitted, stored or otherwise processed.
- 13.2 If you become aware of an information breach, please contact dataprotection@nfwl.org.uk immediately.

14. Lawful Use

- 14.1 You must only use the MCS for the following purposes:
- 14.1.1 of carrying out your role as an employee of the NFWI
 - 14.1.2 of carrying out your role as an employee/Trustee/volunteer of a federation
 - 14.1.3 of carrying out your role as an MCS rep for a WI.
- 14.2 Users of the MCS are expected to use their judgment to act at all times in the best interests of the NFWI, the federations and the WIs while performing their roles.

15. Non-Compliance with this Code of Conduct

- 15.1 The MCS must be used in accordance with this Code of Conduct.
- 15.2 The NFWI will not tolerate the use of the MCS for any purposes that breach this Code of Conduct.

16. Employees

- 16.1 If an NFWI employee misuses the MCS, they will be subject to the NFWI Disciplinary Policy for misconduct and/or gross misconduct which may result in disciplinary action.
- 16.2 If a federation employee misuses the MCS, they will be subject to the federation's appropriate disciplinary policy.
- 16.3 In the event of misuse of the MCS, the NFWI and federations may be vicariously liable for the actions of those who use the system.

17. Compliance with Laws

17.1 This Code of Conduct is made in accordance with the Data Protection Act (2018) and the General Data Protection Regulation (2018).

18. Updates

18.1 The Head of Digital Services at NFWI is responsible for this Code of Conduct and retains the right to update this document as required.

18.2 MCS users are required to ensure that they are always working to the latest version of the Code of Conduct. The current version of the document will be available at all times on My WI.

19. Contact

19.1 If you would like to speak to someone about this Code of Conduct, please contact dataprotection@nfwl.org.uk

Version	Created	Review Date	Document Author
1	25/02/2019	02/09/2019	Naomi Marchant