



Northern Ireland
Women's European Platform

NIWEP Privacy notice

Northern Ireland Women's European Platform (NIWEP) takes data protection seriously and will always be clear about how we collect and use personal data. This privacy notice tells you what to expect when NIWEP collects personal information. It has been prepared in accordance with the General Data Protection Regulation and the UK Data Protection Bill, and applies to all the information we collect about individuals we come into contact with as part of delivering the organisation's strategic plan. The categories of individuals include:

- Visitors to our website
- Members
- Project partners
- People who take part in our events
- Job applicants
- Current and former employees
- Suppliers

Section 1: The rights of individuals and raising concerns

1. The rights of individuals and making a subject access request

Anyone dealing with NIWEP in any capacity that involves sharing personal information with us has a number of rights under the General Data Protection Regulation, which include:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

NIWEP will at all times be clear about why personal data is collected and how it will be processed. NIWEP does not undertake any automated decision making or profiling.

Under GDPR, individuals have the right to see all the information we hold on them and to request rectification of any inaccuracies. We must provide this within 30 days free of charge and in an easily understood format. Where necessary, information will be redacted to protect personal information relating to other identifiable individuals.

Individuals can also ask NIWEP to stop processing or using their information and, where we are processing their information on the basis of consent, to delete the information ('the right to erasure' in the GDPR). In such cases we will immediately stop using the information and will delete the information within one calendar month from receiving the request. The exception to this is in cases where we must keep the information by law, such as in relation to a membership register, or details of Committee members and current employees. In these cases, individuals have the right to see the information and request rectification, where required.

Individuals can access their personal information by contacting the NIWEP office by contacting us at niwep@btconnect.com or on telephone number (028) 9031 1149. The 'subject access request' can be made verbally or in writing and can take any format the individual wishes, as long as it is clear what is being requested. NIWEP may need to contact the individual for clarification in order to fulfil the request, and will do so as soon as timely as possible.

2. Raising concerns

NIWEP is committed to protecting personal data and will take all concerns regarding a breach of data protection or poor practice seriously. A data protection policy is in place within the organisation setting clear principles and procedures for processing personal data, as well as technical safeguarding measures and standards for when any breaches will be reported to the Information Commissioner's Office.

Any concerns should be reported initially to the NIWEP office by contacting us at niwep@btconnect.com or on telephone number (028) 9031 1149. We will take details of the concern and will undertake an investigation. Where required, external assistance will be sought to ensure the concern is investigated thoroughly. We will keep the complainant informed throughout and will undertake the investigation as timely as possible. As circumstances will vary, it is not possible to give an exact timescale; however, we will wherever possible provide a response or at a minimum an update within two weeks.

We will endeavour to undertake the investigation in a manner that does not identify anyone, should the complainant wish to remain anonymous. However, it may be difficult to establish the full circumstances without this information.

Section 2: Information NIWEP collects and how we process it

This section provides an overview of all the personal information NIWEP collects. It includes details on what information is collected on each category of individuals, on what legal basis it is collected, how we use it, and how long we keep it. Wherever possible, there is also an indication of how the rights of individuals to control their information can be realised.

1. Visitors to our website

On our website, we use Google Analytics to collect information on how many visitors the site has had and how visitors use the site, including which pages they visit, the country they access the site from and how long they stay on the site. Google Analytics will record your Internet Protocol address to enable this statistical analysis; however, we will not use this information in a way that identifies anyone and will not allow Google to use it to identify visitors in any way. The exception to this is investigating cases of malicious use or damage to the site. In these cases, we will make attempts to identify the source in order to protect us and those involved with us from additional damage.

The IP address information is stored by Google and accessed only by authorised staff. For information on how Google treats this information see <https://policies.google.com/privacy>.

1.1 Use of cookies

Our website and the Google Analytics service involves the use of cookies. A cookie is a small text file that is placed on the visitor's computer, and is intended to improve the their experience of the site by recognising repeat visitors and assisting visitors to navigate the site. If a visitor does not wish to share this information, it is possible to adjust browser settings to disable cookies. For information on how to do this, see for example <http://www.aboutcookies.org>. By continuing to use the site without doing this, visitors will be deemed to consent to our use of cookies.

1.2 People who contact us via social media

NIWEP uses Facebook and Twitter as its social media platforms. We do not collect any personal information through these platforms and will only share posts and information where we can be reasonably confident that the author has consented to this. Any direct messages sent to us through Facebook or Twitter will be stored by the relevant platform in line with its own privacy notice. We will not share them with anyone.

For information on Twitter's privacy policies see <https://twitter.com/en/privacy>. The Facebook privacy notice is available at <https://www.facebook.com/privacy/explanation>.

1.3 People who email us

We use Microsoft Office 365 as our email service. Emails are securely stored by Microsoft and will be deleted by NIWEP when no longer needed, eg. at the end of a project or after the relevant statutory period ends. For example, emails relating to consent to use personal information will be retained for one year to meet statutory documentation obligations; after this consent will be renewed and previous emails destroyed.

We will monitor any emails sent to us, including file attachments, for viruses or malicious software. This will not involve collecting any personal information.

Information on Microsoft's privacy and data security policies is available at <https://products.office.com/en-us/business/office-365-trust-center-security>.

2. Members

NIWEP is a membership organisation and members are essential to the successful running of the organisation. There are three categories of membership: full membership for organisations working solely with women; associate membership for organisations working with women as a key but not only client group, and individual membership for any woman supporting the organisation's objectives. The Committee is elected by full members, who also approve the annual report and are eligible to vote on any motions including special resolutions to change the organisation's name, structures or Articles of Association.

The Companies Act 2006 and Charities Act (Northern Ireland) 2008 require us to keep a register of members including their contact details and membership category. This information is stored securely and is used to inform members about company business in line with the above legislation. The membership register is by law a public document; however, we will not routinely publish this information and will not share members' contact details with third parties. Members will only be contacted about NIWEP work with their consent.

Members will be contacted annually to enable organisations and individuals to confirm whether they wish to remain members and to update contact details as necessary. Any member can choose to resign at any time by contacting NIWEP. Their information will be retained for one year following resignation for the purposes of meeting statutory record keeping obligations, but will be deleted from the membership register immediately upon resignation. Any member can also see any information NIWEP holds on them and request rectification as necessary by contacting NIWEP. However,

members' details cannot be retrospectively erased due to the statutory nature of the membership register.

2.1 Committee Members

Committee members are elected at NIWEP's Annual General Meeting. The Companies Act 2006 and Charities Act (Northern Ireland) 2008 require us to keep a register of Committee members including their contact details. The names of Committee members must also by law be reported to Companies House for publication in a public register. However, Committee members' personal contact details will not be shared with any third parties.

Committee members will be asked to confirm an email address that will be used internally by NIWEP for sharing Committee papers and other information relating to Committee business, in order to enable Committee members to fulfil their duties as required by the Comp Companies Act 2006 and Charities Act (Northern Ireland) 2008. With their consent, Committee members may also choose to disclose a contact telephone number that can be used by employees to enable efficient contact relating to Committee business, where required. As the employer of all staff within the organisation, the Committee is also required to provide the name and contact details of a person acting as line manager to each employee.

Committee members' name, attendance at and contributions to Committee meetings will be recorded in meeting minutes as required by the Companies Act 2006. These will be kept for at least 10 years in line with the legislation, but may be kept permanently and will be used to provide a historical as well as a legal record for the organisation. Minutes will be stored securely and will not normally be published.

Consent will be sought separately for any photography, audio or video recording that may take place as part of a project or project related event.

Committee members are asked to sign a declaration to confirm understanding of this information, which is kept on file for the duration of their service and ten years following their departure, in line with legislation on minutes.

Committee members' contact details will be retained for one year following their departure for the purposes of meeting statutory record keeping obligations, but the membership register will be updated and Companies House notified immediately. Committee members can ask to see information NIWEP hold on them and request rectification as required. However, Committee members are not able to ask for information to be erased retrospectively, due to the statutory nature of Committee records.

2.2 Committee members participating in international networks

A key objective of NIWEP is to represent women in Northern Ireland in international networks. This may involve, on occasion, a Committee member or members attending international events in third countries. On such occasions, it may be necessary to share personal information with event organisers and travel providers to enable participation in these events. Such sharing will only take place with the consent of the individual or individuals, and NIWEP will undertake to ensure that personal information is shared and stored securely by any third parties for a minimum period required.

3. Project partners

NIWEP will work with a range of organisations and individuals to deliver its strategic plan. Project partners may include member organisations as well as non members. NIWEP will also work with policy and decision makers including elected representatives to inform policy making on topics and issues within NIWEP's remit.

NIWEP will collect personal information from project partners required to undertake the project or initiative, such as a representative's name and business contact details needed to enable communication about the project. This information may be shared with other project partners throughout the duration of the project or initiative, with the individual's consent. Consent will be sought at the outset of the project and cover the duration of the project for sharing of information and retaining essential information for project records for an agreed period. Project records will not be shared without specific consent following conclusion of the project.

Project partners can ask to see information NIWEP hold on them and request rectification as required. Project partners can also choose to stop participating in a project at any time by informing NIWEP. In these cases, NIWEP will retain their information for the duration of the project, to ensure accurate record keeping, but will not process it further or share it with anyone.

Consent will be sought separately for any photography, audio or video recording that may take place as part of a project or project related event.

3.1 People participating in events

Open events are a key part of NIWEP's work. Events may on occasion be open only to members, but are frequently open to any interested individuals. To enable the effective organisation of events, participants will be asked to register beforehand providing essential personal information including name, organisation where relevant, and a contact email address. Participants will also be asked to inform NIWEP about relevant access, dietary or health information where required, which will be used to ensure everyone can participate safely and equitably in the event. It will be necessary to share access, dietary and health requirements with third parties including the venue representatives and caterers in order to facilitate participants' requirements; however, NIWEP will normally share this information in a way that does not identify anyone. The

exception will be in cases where identifying an individual is necessary to protect their vital interests, such as informing health care professionals in an emergency. In such cases, the individual will be informed as soon as safe and practicable to do so.

Registration information will be retained for one month following an event to enable responding to any potential queries. Consent will be sought separately for any photography, audio or video recording that may take place as part of an event.

4. Job and volunteering applicants

NIWEP will manage the application process for both paid and volunteer positions that may arise. As part of the process, applicants will be asked to provide personal information including contact details, education and employment history, referees and responses to specific questions relating to the post. Applicants will also be asked to disclose any unspent convictions in line with employment legislation, and disclose any disability or comparable condition in order to ensure NIWEP can make reasonable adjustments for the applicant, as required by the Disability Discrimination Act 1995.

NIWEP will also collect equality monitoring information as required by Section 75 of the Northern Ireland Act 1998. This information will be collected anonymously and in a way not linkable to any individual. Equality monitoring data will not form part of the assessment process, but is collected for statistical purposes and to demonstrate NIWEP recruitment processes meet S75 obligations.

The information provided on the application will be used to assess applicants' suitability for the relevant post and to select applicants to be called for an interview. At interview stage, the panel will take notes identifying each candidate. Candidates may also be asked to undertake a task generating identifiable information as part of the interview.

Information provided on application forms and at interview will be held securely by NIWEP and will not be shared beyond the interview panel. The exception to this is cases of dispute, when it may become necessary to share this information with relevant third parties including an internal investigatory panel consisting of Committee members, a mediator or where necessary legal representatives. Applicants have the right to see the information held on them and where there is a dispute, access relevant other information. NIWEP will ensure other applicants' contact details remain secure and confidential at all times.

Unsuccessful applicants' data, including equality monitoring forms, will be deleted one year after the recruitment process ends. The successful applicant's data, except the equality monitoring information, will become part of their personnel file and will be retained for the duration of employment and the subsequent six years.

4.1 Conditional offer

NIWEP will make a conditional offer of employment to the candidate most successful at the interview stage. This offer is subject to a number of pre-employment checks, which are required by law and involve collecting information on the candidate's identity and right to work in the UK through taking copies of original documentation provided by the candidate. NIWEP will also obtain references from referees named by the candidate to seek reassurance as to the candidate's integrity and reliability. The candidate has the right to see this information and can do so by contacting NIWEP. The candidate's personal information will not be shared with referees.

Pre-employment check information will be held securely by NIWEP and if a final offer is made and accepted, will become part of the employee's personnel file. This will be kept for the duration of employment and the subsequent six years, in line with employment legislation. If a final offer is not made or is declined, the information will be held for one year to enable NIWEP to deal with any potential queries.

At this stage, where relevant NIWEP may need to share information on a disability or comparable condition with a third party to ensure reasonable adjustments are made to the working environment, in line with the Disability Discrimination Act 1995. NIWEP will aim to share this information in a way that does not identify any individual. Where this is not possible, NIWEP will seek the candidate's consent to do this, and will ensure that any third party only uses the information for the specified purpose and holds the information securely only for the period instructed.

5. Employees

NIWEP will collect essential personal information from employees in order to meet its obligations as an employer and comply with employment, taxation and pension legislation. In addition, personal information including but not limited to performance, supervision, annual leave and sickness records will be generated in the course of employment with NIWEP. All information will be stored securely in the employee's personnel file and will be retained for the duration of employment and the subsequent six years, in line with employment legislation.

Employees will be given a clear overview of what personal data is collected and how it is used as part of their induction, and will be asked to sign a consent form as part of good practice. Employees have the right to see information NIWEP hold on them and to request rectification, where necessary. This does not, however, constitute a right to alteration of performance records on a unilateral basis; concerns of this nature will be dealt with through the NIWEP grievance policy.

5.1 Contact details

Employees will be asked to confirm their name, home address and a contact telephone number to be kept on the personnel file for the purposes of verifying their identity, supporting salary processing and enabling NIWEP to keep in touch with staff in exceptional cases, such as during long term sick absence or unexpected disruption that prevents employees from coming to work (eg. fire or other emergency in the working environment). It is the responsibility of staff to keep NIWEP up to date on any changes in this information; however, information will be reviewed annually to ensure accurate records are kept in line with employment legislation. This information will be retained for the duration of employment and the subsequent six years in line with employment legislation.

Staff will be asked to provide the name and contact details of an emergency contact person, as recommended in health and safety legislation. This information will be stored securely by NIWEP and used only in cases of medical or other emergency, when the employee is unable to personally contact anyone. It will be deleted immediately when the employment relationship ends.

5.2 Payroll

For payroll purposes, employees will be asked to provide their contact details, date of birth, National Insurance number and bank details. NIWEP uses an external service provider for payroll services and will share this information as well as details of the salary with the provider. Payroll will share information on employee their contact details and salary with HMRC in order to facilitate PAYE and comply with taxation legislation. NIWEP has a contract in place with the provider to ensure information is stored securely and processed only as instructed.

Where required to facilitate payment of statutory sick pay or maternity, paternity or adoption pay, NIWEP will share information on employee salary and essential details relevant to the benefit at hand with the Social Security Agency. As part of these statutory processes NIWEP may be required to share relevant health information; in such instances, NIWEP will inform the employee as soon as practicable in order to ensure transparency.

It is the responsibility of staff to keep NIWEP up to date on any changes in banking and contact information; however, information will be reviewed annually to ensure accurate records are kept in line with employment legislation. Information on salary, National Insurance and tax payments will be retained for the duration of employment and the subsequent six years in line with employment legislation. Banking details of former employees will be kept for three years in line with good practice.

5.2 Pension

NIWEP provides a pension scheme in line with the auto enrolment requirement in the Pension Act 2008. The pension contribution is processed through payroll and bank details will not be shared with anyone else. NIWEP will share staff contact details, their date of birth, National Insurance number and salary with the pension provider in order to enable contributions to be calculated and made to the scheme and relevant information sent directly to the staff member

As the pension is for the individual, the pension provider is likely to retain information on the individual until their retirement age in order to enable the pension to be paid out. NIWEP will only liaise with the provider for the duration of an individual's employment with NIWEP, although records will be retained for a subsequent six years. It will be the individual's personal responsibility to liaise with the provider as required following their departure from NIWEP, and NIWEP cannot be held responsible for personal information such as contact details being out of date after this time.

Employees are entitled to opt out of the pension scheme, in which case no information is shared with the pension provider. Should an employee opt out of the pension scheme after initially enrolling, records relating to contributions made will be retained as above, but the pension provider will be asked to stop processing the individual's details further. NIWEP will ensure that employee details are only used for the purposes of managing their pension.

5.3 Personnel file records

NIWEP will maintain a personnel file for each employee in line with employment legislation. In addition, NIWEP will undertake regular supervision and performance appraisal throughout the duration of employment to ensure both a supportive working environment for the employee and a good level of productivity for the organisation. The personnel file will include supervision and performance records, annual leave records and sickness records, any grievance and disciplinary records as well as the employee's personal information, salary and bank details.

The personnel file will be stored securely for the duration of employment and the subsequent six years. NIWEP will not routinely share information in the file with any third party; however, in cases of grievance or other dispute including a complaint to an Industrial Tribunal, it may become necessary to share this information with relevant third parties including an internal investigatory panel consisting of Committee members, a mediator or where necessary legal representatives and the Industrial Tribunal.

6. Suppliers and contractors

NIWEP engages a number of suppliers and service providers to enable effective running of the organisation, for example in relation to payroll, website hosting and provision of stationery, as well as provision of event services including venue hosting, catering and photography. To enable fulfilment of these contracts, NIWEP will collect

essential information from suppliers including a contact name, contact details and banking information for payment purposes.

This information will be stored securely by NIWEP and will be used to liaise with the supplier regarding fulfilment of the relevant contract. Invoice information will be retained for seven years following completion of payment, in line with good financial practice. Contact details of contractors will be retained throughout the duration of the business relationship and one subsequent year, in order to enable NIWEP to contact the contractor in relation to relevant new or repeat business. Information on contractors will not be shared with third parties for any purpose without the contractor's written consent.

Where fulfilment of a contract requires sharing any personal information NIWEP holds with a third party, a contract with the third party will be made, giving the contractor (data processor) clear instructions on how the data is to be used and how long it can be kept, and seeking assurance regarding the contractor's data protection arrangements. The exception to this are instances where data is shared because of a legal or statutory duty to do so, such as sharing salary information with HMRC and a pension provider, or providing relevant information to the Social Security Agency to enable payment of Statutory Sick Pay or maternity, paternity or adoption related payments.