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**HELOA PRIVACY NOTICE FOR COMMITTEE MEMBERS**

**on handling HELOA members’ data**

# Purpose of this Privacy Notice

This privacy notice covers the handling and storage of HELOA members’ personal data by elected and appointed HELOA members. It outlines how committee members collect, share and use members’ personal data.

# Data Collection and Privacy Notice

HELOA processes personal data as a “Data Controller” on behalf of their members, partners and speakers, as defined in the Data Protection Act 2018 (“the DPA”) and the General Data Protection Regulation (Regulation (EU) 2016/679) (“the GDPR”).

This notice relates to information about HELOA members, which will be collected by HELOA and processed as described below. This notice may be updated at any time.

Members’ personal data must be processed in compliance with current data protection legislation including the Data Protection Act 2018, and the General Data Protection

Regulation (GDPR), which came into force on 25th May 2018.

# **What we collect**

We collect the following information:

* Name and contact details
* Pronoun preferences (optional for event bookings)
* Name of institution
* Job title
* Work address
* Work email address
* Work telephone number
* Photographs or video recordings (for the website, marketing materials and/or socials)
* Health information (including medical conditions, allergies and medical requirements, (for the purposes of supporting event planning and delegate access needs only)
* Dietary information (including allergies and health conditions for the purposes of attending HELOA events only)
* Information about care needs (including disabilities, dietary requirements and general care provisions only if required to support delegate event attendance)
* Information about support requirements (only if required for the purposes of supporting event planning and delegate access needs)
* Records of meetings and decisions (meeting attendance records and comments and questions raised)
* Payment details (bank information for payment of speaker/ supplier expenses)

# **How do we collect members’ data?**

We will receive the data directly from our members’ applications, national and/or group event bookings and speaker bookings.

# Retention

We will retain members’ personal data, nationally and locally, in order to keep in touch with our members for as long as necessary or unless they withdraw consent or do not renew their membership. When membership ceases, data will be deleted from the central Customer Relationship Management (CRM) system and mailing lists, as soon as possible once the office has been informed. Group data will be updated regularly, with no data being kept for longer than 1 year. HELOA financial data will be retained for 6 years and HELOA conference bookings will be retained for up to 3 years after the event.

# How we use members’ data

We collect personal data in order to keep in touch with our members and provide information. We do not, for this purpose collect any special categories of data relating, for example, to disability or ethnic background. Only if members are attending a group or national event, we may ask for special category data to support all individual and organisational event requirements, including health information such as allergies, disabilities, health requirements and dietary requirements.

The information members provide may be used by HELOA to contact them with regards to, membership, events, training, meetings and sector updates. It is recognised that members may wish to opt out of receiving specific communications and can do so by completing the [HELOA Privacy Preferences Form](https://docs.google.com/forms/d/e/1FAIpQLSd2bmo7XS9OH3oWjWRN7ZApgDUS2FtufSmEpb27qKV0kceIIw/viewform?usp=sharing).

As part of the HELOA processes we are required to share members’ data with appropriate individuals within the organisation and some external processors. Please ensure that this data is stored securely on the HELOA email and drive accounts and only available to the appropriate committee members and processors. A full list of the reasons for using members’ personal information is given in **Table 1** and shows the legal basis that we use for processing.

# Who we share members’ information with

* HELOA Committee members - on a need to know basis in relation to membership, groups, training, finance, governance and communications
* Edge Hill University - storage of contact details and documents for editing and printing purposes, accessible by HELOA office staff and relevant Edge Hill University stafF
* Dynamics - storage of membership details
* Mailchimp - communications with members
* Jiscmail - communications with specific groups of members
* Google - storage of membership details, collecting membership, bookings and feedback details and communications with members
* External auditor - accounting
* Sage Accounting - accounting

A full list of the different organisations that HELOA may share members’ data with is given in **Table 2**.

# Processing Activity Register

The Processing Activity Register details: the data we store, where it is stored, what it is used for, who has access and the retention period for each. Committee members are responsible for ensuring the information on the Processing Activity Register is accurate and up to date and should be reviewed annually as part of the annual GDPR review. The register can be accessed via the HELOA Google accounts in the HELOA Office shared folder. Inform the office if this register requires amending.

[HELOA Processing Activity Register](https://docs.google.com/spreadsheets/d/1X4beZeumHFYS4DCjYtex6ZFAT2ni1c86/edit?usp=sharing&ouid=112828291991283435949&rtpof=true&sd=true)

# Sharing information outside the UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place. For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please use the links in Table 3 or contact us using the contact information provided. See **Table 3** for full details.

# HELOA committee members must:

1. Process members’ data in compliance with current data protection legislation including the Data Protection Act 2018, and the General Data Protection Regulation (GDPR), which came into force on 25th May 2018.
2. Use HELOA Google accounts to store members’, speakers’ and partners’ data, HELOA documentation and records. At times it may be necessary to use work emails and a secure area of your institution’s server but this must be limited to when information is deemed sensitive and is not to be shared with other committee members.
3. Ensure devices used to access HELOA accounts and systems are password protected.
4. Ensure only the necessary people have access to HELOA members’, speakers’ and partners’ data.
5. Adhere to the HELOA retention periods.
6. Inform the office if the Processing Activity Register requires amendment.
7. Inform the office and Vice-Chair (Governance and Policy) if there has been a data breach, immediately or as soon as becoming aware of the breach. If the breach is considered high risk, the Information Commissioner’s Office (ICO) must be informed by the Vice-Chair (Governance) within 72 hours of becoming aware of the breach.

# Resignation

Once a committee member has decided to stand down, they must:

1. Inform the relevant UK Vice-Chair/ Group Chair and office of their official leaving date;
2. Pass on any relevant data to the successor, appropriate UK Vice-Chair/ Group Chair, or the HELOA office;
3. Delete any nonessential or duplicate data, and;
4. Following the resignation date, sign out of HELOA accounts and systems on their devices.

# Members’ rights

Under the current UK data protection legislation, members have certain rights over how their data is processed, including the right to know what information is processed about them and how it is processed. This legislation provides them with the right of access to their personal information. Additionally, they have the right to rectify inaccurate information; restrict processing; and object to processing. These rights are limited in certain circumstances so as to ensure compliance with other legal and statutory obligations, for example where data is processed for research or statistical purposes. Further data about these rights can be found on the [Information Commissioner's Office website.](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/?q=article+4)

Members have the right to know what information HELOA holds about them. To obtain this information from HELOA, they must submit a subject access request in writing. For further details on how to do this, see the [HELOA Subject Access Request Policy](https://www.heloa.ac.uk/wp-content/uploads/HELOA-Subject-Access-Request-policy.pdf).

# HELOA contact details

HELOA Office, Edge Hill University,

St Helens Road,

Ormskirk,

Lancashire,

L39 4QP

**Email:** [office@heloa.ac.uk](mailto:office@heloa.ac.uk)

**Telephone:** 01695 654 392

# How members can complain

If members have any concerns about our use of their personal data, they can make a complaint to us using the contact details above. If they remain unhappy with how we’ve used their data after raising a complaint with us, they can also complain to the ICO.

Information Commissioner’s Office (ICO)  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Website: [ICO website - Make a complaint](https://ico.org.uk/make-a-complaint/)

# **Changes to the Privacy Notice**

We regularly review this policy and will update it if there are changes in how we manage or use members’ data.

# Table 1 - How HELOA may use members’ information

| **Purpose** | **Legal Basis** |
| --- | --- |
| Membership   * Administer HELOA membership * Create membership profile on Dynamics * Create and share individual membership number * Add as subscriber to newsletter and relevant group mailing lists | Consent  Contract |
| Membership Engagement   * Track and analyse group and national meeting and event attendance * Track and analyse group and national election voting * Track and analyse individual, institutional and group numbers * Use membership engagement data to identify trends and insights to help improve HELOA’s offering | Consent  Legitimate interest |
| Groups   * Review membership of meeting and event bookings * Log meeting and event attendance * Support vetting role applicants to ensure they are group members * Support primary contact voting in group elections * Process mentoring scheme | Consent  Contract |
| Finance   * Hold institutional contact and finance details for membership invoicing * Facilitate payment of committee members’ expenses for HELOA business * Facilitate payment of member speaker expenses for group and national events | Consent  Contract  Legal obligation |
| Elections, recruitment, selection & resignations   * Process nominations and elections * Process appointed officer applications * Collect pre-application approval from line-managers * Provide applicant details to interview panels * Contact applicants regarding the status of their application * Onboarding and induction * Administer newly elected and appointed committee members * Process resignations of committee members | Consent  Contract  Legitimate interest |
| Partnerships   * Store webinar delegate bookings * Support event planning * Support delegate attendance needs | Consent  Legitimate interest |
| National & Group Training   * Store delegate booking details * Support event planning * Support delegate attendance needs | Consent  Contract  Legitimate interest |
| Members’ learning and development   * Committee members’ induction * Group mentoring schemes * Process Continued Professional Development (CPD UK) approval and certificates for accredited events (New Practitioners’ Conference, Professional Development Conference and some group training sessions) | Consent  Contract  Legitimate interest |
| Photographs & Recordings   * Committee members photographs are displayed on the committee members’ and group committee pages of the website and on the structure charts * Speaker photo and bio shared on training pages, event programmes and event emails * Annual General Meeting (AGM) recording for the accuracy of the minutes (office use only) * Online training session & webinar recordings shared with members * Photographs and recordings of sessions and events used for marketing materials, socials and the website | Consent  Legitimate interest |
| Website   * Sharing committee details with members and external parties * Sharing training session details including speakers (members) with the membership * Event marketing * Session details, presentation materials and documentation storage | Consent  Legitimate interest |
| Member communications - HELOA may use your personal data to contact you in regards to:  1. Membership Details   * Welcome email with membership details and number * Your institutional membership details and membership fees (Primary Contacts) * Financial remunerations with HELOA (Primary Contacts) * Your Primary Contact’s details and role descriptor   2. Information Sharing   * Sector updates via email and social media * HELOA newsletter (Bulletin) * Promotion of partner, sponsor and supporters’ events and updates * The HELOA annual awards * HELOA news via social media channels * Vacancies in the sector   3. Governance   * HELOA vacancies, role descriptors and the election and appointed processes * Voting opportunities and process * The HELOA Annual General Meeting (AGM) details, minutes and reports * HELOA policies, procedures and guidelines * Details of relevant data breaches and the mitigations taken   4. Groups   * Group welcome email * Group meeting and event details * Meeting minutes/ notes and documents * Group and partner updates * Group vacancies, role descriptors and the election process * Promotion of partner events and updates   5. National Training   * Training event details * Session notes, documents and presentations * Promotion of partner and sponsor sessions at events   6. Surveys   * Facilitate the HELOA membership survey * Collection of feedback following group and national event attendance   7. Rewards, benefits and wellbeing   * Facilitate rewards - survey participation prizes, free event places * Facilitate benefits - sharing training, networking and event opportunities and details relating to HELOA membership * Facilitate wellbeing - sharing of online and in person wellbeing events supported by/ provided by HELOA   8. Committee Roles   * Share HELOA vacancies * Welcome email and your term details * Submitted expenses, travel booking requests | Consent  Legitimate interest  Consent  Legitimate interest  Consent  Legitimate interest  Legal obligation  Consent  Legitimate interest  Consent  Legitimate interest  Consent  Legitimate interest  Consent  Legitimate interest  Consent  Contract  Legitimate interest |

# Table 2 - List of organisations that HELOA may share members’ data with

| **Organisation/ Group** | **Purpose of the sharing the Information** | **Legal Basis** |
| --- | --- | --- |
| Apps Vietutd | Send copy of form responses to form completer | Consent  Legitimate interest |
| Barclays | Accounting | Legal obligation |
| Bick Accountants | Institutional members’ and individual members’ details & financial details | Legal obligation |
| Charity Commission for England and Wales | Trustee contact details | Legal obligation |
| CPD UK | Provides CPD accreditation for accredited training events | Consent  Legitimate interest |
| Digital Inspiration | Send copy of form responses to form completer (does not retain HELOA data on their servers) | Consent  Legitimate interest |
| Dynamics | Membership database - storage of membership details | Consent  Contract |
| Edge Hill University Document Store | Downloading ontact details and documents for editing and printing purposes. | Consent  Contract |
| Facebook | Sharing updates with members | Consent  Legitimate interest |
| Google Drive | Storage of membership details, event details and promotion | Consent  Contract |
| Google Forms | Collect contact details, booking details and feedback | Consent  Contract  Legitimate interest |
| Google Gmail | Communications with members | Consent  Contract  Legitimate interest |
| Instagram | Sharing updates and event details and promotion | Consent  Legitimate interest |
| Jiscmail | Communications with specific groups of members | Consent  Contract  Legitimate interest |
| LinkedIn | Sharing updates and event details and promotion | Consent  Legitimate interest |
| Mailchimp | Communications with members | Consent  Legitimate interest |
| Sage Accounting | Accounting | Legal obligation |
| Wordpress (Website) | Event marketing, session details, presentation materials and documentation storage | Consent  Legitimate interest |
| X | Sharing updates | Consent  Legitimate interest |
| You Tube | Sharing updates, videos, marketing and event promotion | Consent  Legitimate interest |
| Zoom | Online meetings and training events | Consent  Legitimate interest |

# Table 3 - Sharing information outside the UK

| **Organisation** | **Category of recipient** | **Country personal data is sent to** | **How the transfer complies with UK data protection law** |
| --- | --- | --- | --- |
| Apps Vietutd | Send copy of form responses back to form completer | USA | [Privacy Policy](https://en.vietutd.com/p/privacy-policy.html) |
| Digital Inspiration | Send copy of form responses back to form completer (does not retain HELOA data on their servers) | USA | [GDPR compliance](https://digitalinspiration.com/gdpr) |
| Google | Email communications, data collection & storage  Youtube - video content | USA | [The country or sector has a UK data bridge (also known as Adequacy Regulations and Standard Contractual Clauses](https://policies.google.com/privacy/frameworks?hl=en-US) |
| Mailchimp | Communications with members | USA | [Addendum to the EU Standard Contractual Clauses (SCCs)](https://mailchimp.com/legal/data-processing-addendum/) |
| Zoom | Video meeting platform | USA | [Addendum to the EU Standard Contractual Clauses (SCCs)](https://www.zoom.com/en/trust/gdpr/) |