

## Information Audit 2023



Membership data is held centrally on the Action Network database. The sources of this information are 2 fold:

1. historic data membership data given by members to the SHA originally held on a database and laptop subsequently transferred to our Action Network on line membership system.
2. new members who join direct onto the Action Network system.

The membership data is made up of records of those who are current members or those who are about to be lapsed for non payment of membership fees. We aim to delete the records of lapsed or resigned members within 12 months of them leaving the association.

Normally twice a year this information about current members is extracted to produce an electoral roll for voting software eg Anonyvoter. Rarely we use MailChimp to supplement Action Network.

Secretaries and principle officers (Chairs and Treasurers) of devolved nations and English Branch Secretaries and principle branch officers have access to membership information for members within their constituencies. They are expected to access this through restricted permissions on Action Network unless there are technical problems in which case a spreadsheet may be generated for temporary use.

Below a fictitious member record showing the data fields.

	FIRST NAME	Ann
	LAST NAME	Smith
	EMAIL	ann@smith.com
MOBILE NUMBER		0123456789
ADDRESS		1 Acorn Rd
CITY		Abertawe
		United Kingdom
ZIP/POSTAL CODE		ap1 1aa
		Welsh

- Date Joined
- Job - Organisation
- Job - Role
- Labour Party member
- Membership expiry
- Membership number
- Notes
- Old member type
- Parliamentary constituency
- Payment Method
- SHA Branch
- SHA membership status
- SHA membership type
- Title
- Twitter Handle

The three Officers (Chair, Secretary and Treasurer) plus, when needed, directors have full access to the association's data. The left column contains core

*fields present all membership record. Right column comprises additional fields which may be populated. Additional fields such as SHA working group membership may be added.*

Additional sources of data about our members exists in PayPal for which the Treasurer has principal responsibility though is able to share with other officers as needed.

Consent from our members to hold their data is explicitly sought on joining. Permission to contact them can be modified

directly by members by unsubscribing from email or text messaging at both local and whole organisation levels.

The data is processed on the basis of providing information to members, including ballots for our democratic processes, in return for their membership fees - a contractual basis.

SHA data is shared with a number of data processors - some providing on line services that is Action Network, PayPal, Stripe, our contractor providing organiser / admin services and technical support provided by web and database professionals.

Some additional data (email addresses) is collected on our website for those who wish to be notified about new blogs. Similarly Zoom virtual events sometimes require registration particularly if online voting is required so delegates can be identified. From time to time recordings of meetings are held with the permission of participants.

## PRIVACY POLICY

THE SOCIALIST HEALTH ASSOCIATION is a campaigning Socialist Society Our principal business activities are laid out in our constitution. We work with partners, the Labour Party, trade unions and health campaigns to deliver on our objectives but we don't share your information with them.

The SHA is a registered company and is a data controller:

SOCIALIST HEALTH ASSOCIATION LIMITED Company number 13712108. Correspondence address 160 City Road, London, England, EC1V 2NX

We comply with data protection legislation such as the Data Protection Act 2018 and the General Data Protection

Regulation which regulates the processing of data and ensures that your data is processed fairly and lawfully, is kept secure and only that data necessary for any processing is kept.

This policy summarises the information we may collect about you and how we may use that data. We primarily collect data to provide you with services you have requested, to provide services likely to meet your needs. The policy tells you how we ensure the information we have is kept accurate and how you can request access, deletion, rectification, restriction, transfer and withdraw consent (where applicable) and make a complaint.

We may update the privacy policy at any time without notice so please check back regularly so you are aware of any changes. This privacy policy is subject to our terms and conditions which are found on our website.

## **1. What Information do we collect and how is this collected?**

We only collect personal information if we have your permission, or we have reasonable commercial reasons for doing this, such as collecting information to process event registrations or to supply you with services. We will only collect the minimum amount of information we need to do these things.

We collect some of the following data such as name, home post code, email address, telephone / mobile number, interests and history, content you post on our websites. We do not monitor content you read on our websites. This data may be collected when you order a service or product, use our websites (or a third-party website e.g. to pay for a subscription), post content to our websites, sign up for a newsletter or subscription, on completion of a survey, questionnaire or possibly an entry to a competition, or by communication to us by email, phone and by other means.

When you pay us, we will record details of the financial transaction but do not directly store your debit or credit card information. Online payments are made through our websites but are processed securely by a third-party payment provider: we only store the last 4 digits of your credit card number. If you use our website, we may record your IP address, registration details and your browsing history such as the pages you have visited within our sites. If you sign up for a newsletter, we may track your response e.g. open a newsletter or click on a link in a newsletter or the pages you visit.

For employees we keep personal data needed to recruit you, pay you, provide company benefits and to fulfil our legal obligations.

We do not share personal data with third parties.

## **2. Cookies**

We may use cookies to monitor web usage. Cookies are written to the hard drive of a web user, they contain no personal information about the website user and only keep a record of the sites visited and actions on the web site. Some cookies expire after your browser is closed whilst others stay on your hard drive. They are of standard use across many websites. We use them on an aggregated information basis and to assess your areas of interest – they are used to identify the number of unique visitors to a site, to improve further web visits (store preferences, user name and your email address so you don't need to reinput every time you visit) and to improve the user experience for you by, amongst other things, providing content based on your preferences. We use the following categories of cookies on our websites: (1) Strictly necessary cookies. These cookies are essential in order to enable you to move around the website and use its features. Without these cookies, services you have asked for such as remembering your login details cannot be provided. These cookies cannot be disabled (2) Performance cookies. These cookies collect anonymous

information on how you use a website. The data stored by these cookies never shows personal details from which your individual identity can be established. Without these cookies we cannot learn how the website is working to make improvements which improves your browsing experience (3) Functionality cookies. These cookies remember choices you make and then can be used to provide you with an experience more appropriate to your selections and to make the visits more tailored and pleasant. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites (4) Targeting or advertising cookies. These cookies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advert as well as help measure the effectiveness of an advertising campaign. They remember the websites you visit and share that information with advertisers. We are in the process of updating our systems so that when you visit a website we ask for your consent to show you personalised advertisements based on your browsing habits.

Most browsers offer you ways to control or block cookies should you wish to. These browser controls will usually be found in the “options” or “preferences” menu in your toolbar. The “help” portion of the toolbar on most browsers will tell you how to stop or manage cookies. Note that should all cookies be rejected we are unable to match site content appropriate to the preferences given to us by previous visits and you will not be able to fully utilise all of the web site features. For further information on cookies visit [aboutcookies.org](http://aboutcookies.org) or the Information Commissioner's webpage on cookies [ico.org.uk/for-the-public/online/cookies/](http://ico.org.uk/for-the-public/online/cookies/).

### **3. Legal basis for processing data**

Different legal bases are used which depend upon the purpose for processing your data.

- When data is provided when purchasing a service under a contract with you we process your data under contract necessity with the data being needed to fulfil the contract.
- When you sign up for a newsletter, an event or subscription we process your data under consent
- Any additional processing i.e. sharing data with third parties, marketing to you on behalf of third parties is done through either consent or legitimate interest. In the case of legitimate interest, we have balanced our interests with yours and do not believe these activities will have a negative impact on your privacy rights and freedoms.
- When you pay us, or we pay you, we only keep data as long as it is necessary to comply with the law.

#### **4. Use of personal data**

We will only use personal information for the purpose it was collected. Should we ever wish to use it for another purpose we will contact you first asking you for your consent. We primarily use data to communicate with you, deliver the service you have requested, or services that might interest you (subject to your right to opt out with the details on how to do this found on the website), to renew a subscription, improve our service, to verify your identity when taking payment or to meet legal, regulatory and compliance requirements.

Profiling – from time to time we may use some elements of the data you supply to target the messages we send you. For example, we may use your location to send you information about an event which is happening in the same country or area. We may use your interests to send you a relevant information. We do not use this information to make automated decisions.

#### **5. How long do we keep your data for?**

Data is not kept any longer than is required for the purposes of the processing or to comply with the law. As we collect data for

many different purposes there is not a single retention period for all data. We instead carefully assess the length of time to retain data according to the processing purpose and to comply with our legal obligations. When data is no longer required for the purposes of the processing it is securely removed from our systems.

## **6. Security & Confidentiality**

The SHA takes commercially reasonable physical, technical and administrative measures to protect personal information from theft, misuse or accidental destruction and to keep it confidential. We aim to protect personal information but cannot provide a 100% guarantee of security. All employees and data processors (third parties who process data on our behalf) who access your data are obliged to keep the information confidential and secure and not to use it for any other purpose other than that they are contracted to carry out for us.

## **7. Transfer of data to third parties**

We may use third party providers e.g. for web site hosting, web maintenance, email alerting, subscription fulfilment and taking payment. We share information with these third party to provide these services. We collect broad statistical anonymised information on an aggregate basis for example to determine the level of affiliation payments we need to make. This allows us to provide content free of charge. We will also share data with public or regulatory authorities where required by law or to enforce our terms of service. We take reasonable commercial steps to ensure that your data is kept secure and confidential by any third party, is deleted when not needed for the purpose it was given, that their data privacy policies protect your data and that they only process your data on our instruction. Your data will be processed fairly, lawfully and securely in by companies which comply with GDPR regulations. and will only be transferred outside of the European Union when there is

protection in place for your rights and when the data will be kept secure.

## **8. Withdrawal of consent**

When you have provided consent, if you should wish to withdraw that consent, you can use unsubscribe functions or let us know by sending us an email to [admin@sochealth.co.uk](mailto:admin@sochealth.co.uk) including the email address of your account and we will remove your data from our systems.

## **9. Restriction of liability**

Our websites link to other websites. The SHA is not responsible for the privacy policies of those websites nor does it have or accept any liability for their content.

## **10. Legal information and how to contact us**

You have the right to see, erase and correct data we hold, the right to restrict the processing we do, and the right to object to it. If you wish to do any of these things or have any questions about how we use your data, or wish to make a complaint about any privacy issues, please contact the [chair.sha@gmail.com](mailto:chair.sha@gmail.com) (Currently financial year 2023/24 Mark Ladbrooke) or write to him at: 9 Bateman St, Oxford. OX3 7BG

Requests will be dealt with and responded to within a reasonable period, but please be aware this is not an employed role. If you are not satisfied with the way your request was handled you have the right to lodge a complaint with the supervisory authority – details of which are given below:

Information Commissioner's Office Tel: +44 303 123 1113  
<https://ico.org.uk/concerns/>