

Syston & District U3A Data Protection Policy

Scope of the policy

This policy applies to Syston & District U3A and sets out our requirements for gathering information for membership purposes. The policy details how your personal information will be gathered, stored and managed in line with General Data Protection Regulations. The policy is reviewed on an ongoing basis by the U3A to ensure we are compliant, and should be read alongside our “Privacy Policy and Your Personal Information” document.

Why this policy exists

The policy exists to ensure that the U3A:

- Complies with data protection law and follows good practice
- Protects your rights as a Member
- Is open about how we store and process your data
- Protects itself from the risks of a data breach

General guidelines for Committee Members and Group Organisers

- The only people able to access Members’ data will be those who need to communicate with or provide a service to you.
- The U3A will provide training to Committee Members and Group Organisers regarding their responsibilities when handling data.
- Committee Members and Group Organisers should keep all data secure by taking sensible precautions and follow the guidelines below:
 - Strong passwords must be used and should never be shared.
 - Data should not be shared outside of the U3A unless with prior consent or for specific, agreed, reasons. Examples could include Gift Aid information to HMRC, or information to the Third Age Trust to receive publications.
 - Members will be asked to update their information if details change, to ensure accuracy at all times, or if data policy changes.
 - Additional support will be sought from the Third Age Trust where questions or incidents regarding data protection arise.

General Data Protection Regulation principles (GDPR)

GDPR identifies the following key principles regarding data collection and storage:

- 1 - It will be processed lawfully, fairly and in a transparent manner
- 2 - It must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

3 - Its collection must be adequate, relevant and limited to what is necessary for the purposes(s) it is collected for.

4 - It should be accurate and where necessary kept up to date; every reasonable step must be taken to ensure that inaccurate data is deleted or rectified without delay, having regard to the purpose for which it is held.

5 - It must be kept in a form which permits identification of individuals for no longer than is necessary for the purposes for which the data is held. Data may be stored for longer periods only for archiving purposes in the public interest, scientific or historical research, or statistical purposes, and only if the appropriate GDPR technical and organisational measures required are followed to safeguard the rights and freedoms of individuals.

6 - It must be processed in a way that ensures data security, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage, by using appropriate technical or organisational measures.

Lawful, fair and transparent data processing

We request personal information from Members for membership applications and to send information about taking part in the U3A. Forms used to request personal information will contain a privacy statement that inform Members about why information is being requested and what it will be used for.

The reason in law for asking for the information is due to our contractual relationship that we have with individual Members. In addition, Members are asked to agree to specific processing purposes. Members will be told who to contact if they wish their data not to be used for the purposes for which they have consented.

Processed for specified, explicit and legitimate purposes

Members will be informed about how information will be used and the Committee will try to ensure that it is only used appropriately, including:

- Communicating with Members about U3A events and activities
- Group Organisers communicating with Members about group activities
- Sending Members' details to the Third Age Trust for the distribution of "Third Age Matters" and "Sources" publications and Trust events and activities
- Communicating with Members about membership and their renewal
- Communicating with members about specific issues that may have arisen during the course of their membership

The U3A will ensure that Group Organisers are aware of what is considered inappropriate communication: for example, sending Members marketing or promotional material from external providers.

The U3A will ensure that Members' information is managed in such a way that it does not infringe an individual Member's rights, which include:

- The right to be informed and the right of access to the information held
- The right to have information corrected or removed
- The right to restrict processing or passing on the information, and
- The right to object to information being held and used

Adequate, relevant and limited data processing

U3A Members will only be asked to provide information that is relevant for membership purposes. This will include:

- Name and postal address, email address, telephone numbers, and Gift Aid entitlement
- Where additional information may be required, for example health related information, this will be asked for with the Member's consent who will be told why the information is required and the purpose that it will be used for
- Where the U3A organises a trip or activity that requires next of kin information to be provided, Members will be asked to provide the information in case of emergency.

Photographs

Photographs are classified as personal information. Where group photographs are being taken Members will be asked to step out of shot if they don't wish to be in the photograph.

Otherwise, consent will be obtained from Members so that photographs can be taken and Members will be told where they will be displayed. If a Member wishes to remove their consent and have their photograph removed then they should contact the U3A to ask that their photograph not to be displayed.

Accuracy of data and keeping data up-to-date

The U3A has a responsibility to ensure Members' information is up to date; to do this Members will be asked to tell the Membership Secretary if their personal information changes.

In addition, the annual membership renewal process will provide an opportunity for Members to inform the U3A about changes in their personal information.

Accountability and governance

The U3A Committee is responsible for ensuring that the U3A complies with GDPR requirements and has evidence to show that it does. Where Members' consent is required the evidence of this consent (either electronic or paper) will be obtained and retained securely. The Committee will ensure that Committee Members and Group Organisers are given an induction about GDPR requirements and the implications for their roles.

Committee Members should stay up to date with guidance and practice in the U3A movement and request input from the Third Age Trust should any questions arise.

The Committee will review its data protection, who has access to information, and what data is held regularly. When Committee Members and Group Organisers leave their roles they will be asked to either pass on data to those who need it delete it.

Secure Processing

U3A Committee Members are responsible for ensuring that data is securely held and processed, including:

- the use of strong passwords and not sharing passwords with others
- only sharing Members' information with others who need to communicate with Members regularly
- using password protection on laptops and PCs containing personal information
- using password protection or secure cloud systems when sharing data between committee members and/or group conveners

Members access to their personal information

Members are entitled to ask for access to the information held about them by the U3A. Any request should be made in writing to the Membership Secretary. When a request made it will be acknowledged and dealt with within 28 days unless there are exceptional circumstances as to why the request cannot be granted.

The U3A will provide a written response detailing the information held about the Member and a record will be kept of the dates of the request and the response.

Breaches of Data

If breach of data protection occurs action will be taken to minimise harm or risk to the person(s) concerned. This will include informing all Committee Members about where, when, and how a breach has occurred.

The Committee will attempt to rectify the cause of the breach as soon as possible to prevent any further loss of data or risk, and contact relevant U3A Members to inform them about the breach and the action taken to resolve the problem.

The U3A Chair will, with 24 hours, notify the Third Age Trust about the breach, and a discussion will take place between the Chair and National Office about the seriousness of the breach and the action to be taken; where necessary the Information Commissioner's Office will be notified.

Where a U3A Member feels that there has been a breach by the U3A, a Committee Member will ask for relevant information to be provided, in writing. The alleged

breach will then be investigated by members of the committee who are not in any way implicated in the breach.

Where the Committee needs external support, or if the breach is serious, they should notify the Trust. The U3A Member should also be informed that they can report their concerns to the Trust if they are dissatisfied with the U3A's response. Breach matters will be subject to a full investigation, records will be kept, and all those involved notified of the outcome.

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