

Arun East U3A Data Protection Policy –

Scope of the policy

This policy applies to the work of Arun East U3A. The policy sets out the requirements that Arun EastU3A has to gather information for membership purposes. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis to ensure that we are compliant. This policy should be read in tandem with Arun East U3A's Privacy Policy.

Why this policy exists

This data protection policy ensures Arun East U3A:

- Complies with current data protection law and follows good practice
- Protects the rights of members
- Is open about how it stores and processes members data
- Protects itself from the risks of a data breach

General guidelines for committee members and group leaders

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to Arun East U3A members.
- Arun East U3A will ensure committee members and group leaders understand their responsibilities when handling data.
- Committee Members and group conveners should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used and they should never be shared.
- Data should not be shared outside of the U3A unless with prior consent and for specific and agreed reasons. Examples would include Gift Aid information provided to HMRC or information provided to the distribution company for Third Age Trust publications.
- To ensure accuracy, member information should be reviewed periodically to ensure accuracy, via the membership renewal process or when policy is changed.

Data protection principles

The General Data Protection Regulation identifies key data protection principles:

Principle 1 - Personal data shall be processed lawfully, fairly and in a transparent manner

Principle 2 - Personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Principle 3 - The collection of personal data must be relevant and limited to what is necessary in relation to the purposes for which they are to be used;

Principle 4 – Personal data held should be accurate, up to date; every reasonable step must be taken to ensure that any personal data inaccuracy is amended or deleted without delay;

Principle 5 – Personal data must kept for no longer than is necessary for the purposes for the which it was collected.

Principle 6 - Personal data must be processed in accordance a manner that ensures appropriate security of the personal data.

Lawful, fair and transparent data processing

Arun East U3A requests personal information for membership applications.. The forms used to request personal information and contain a privacy statement stating and the limitations of the use of the information. The lawful basis for obtaining member information is due to the contractual relationship that Arun East U3A has with members. In addition, members will be asked to provide consent for specific processing purposes - Gift Aid etc.

Processed for specified, explicit and legitimate purposes

Members will be informed as to how their information will be used and the Committee of Arun East U3A will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about Arun East U3A events and activities
- Group leaders communicating with group members about specific group activities
- Consent will be sought in order to add members details to the direct mailing information for the Third Age Trust magazines – Third Age Matters and Sources
- Sending members information about Third Age Trust events and activities
- Communicating with members about their membership and/or renewal of their membership
- Communicating with members about specific issues that may have arisen during the course of their membership

Arun East U3A will ensure that group leaders are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending U3A members marketing and/or promotional materials from external service providers.

Arun East U3A will ensure that members' information is managed in such a way as to not infringe an individual members rights which include:

- The right to be informed
- The right of access
- The right to rectification/erasure

Adequate, relevant and limited data processing

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

- Name
- Postal address
- Email address
- Telephone number
- Gift Aid entitlement

If additional information is required such as health related information this will be obtained with the consent of the member who will be informed as to why this information is required and the purpose that it will be used for.

Where Arun East U3A organises a trip or activity that requires next of kin information to be provided, this information will only be retained for the specific reason requested.

Photographs

Photographs are classified as personal data. Where group photographs are being taken members should be asked to step out of shot if they don't wish to be in the photograph. Otherwise consent will be obtained from members in order for photographs to be taken and members will be informed as to where photographs will be displayed. Should a member wish at any time to remove their consent and to have their photograph removed then they should contact the secretary or chairman to advise that they no longer wish their photograph to be displayed.

Accuracy of data and keeping data up-to-date

Arun East U3A has a responsibility to ensure members' information is kept up to date. The membership renewal form will provide the opportunity for members to provide accurate information, Members are required to inform the membership secretary of any changes to this information.

Accountability and governance

The U3A Committee is responsible for ensuring that the U3A remains compliant with data protection requirements and can evidence that it has. Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely. The U3A Committee will ensure that new members joining the Committee understand the requirements of GDPR and the implications for their role. Arun East U3A will also ensure that group leaders are made aware of their responsibilities in relation to the data they hold and process. Committee Members shall also stay up to date with guidance and practice within the U3A movement and shall seek additional input from the Third Age Trust National Office should any uncertainties arise. The Committee will review data protection and who has access to information on a regular basis as well as reviewing what data is held. When Committee Members and Group Leaders relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

Secure Processing

_____ Committee Members have a responsibility to ensure that data is both securely held and processed. This will include:

- Committee members using strong passwords
- Committee members not sharing passwords
- Restricting access of sharing member information to those on the Committee who need to communicate with members on a regular basis
- Using password protection on laptops and PCs that contain personal information
- Using password protection or secure cloud systems when sharing data between committee members and/or group leaders

Subject Access Request

U3A members are entitled to request access to the information that is held by Arun East U3A. The request needs to be received in the form of a written request to the Membership Secretary of Arun East U3A. On receipt of the request, the request will be formally acknowledged and dealt with expediently (the legislation requires that information should generally be provided within one month). A written response detailing all information held on the member. A record shall be kept of the date of the request and the date of the response.

Data Breach Notification

Were a data breach to occur action shall be taken to minimise the harm. This will include ensuring that all Arun East U3A Committee Members are made aware that a breach has taken place and how the breach occurred. The Committee shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The Chair of the U3A shall contact National Office within 24 hours of the breach occurring to notify of the breach. A discussion will take place between the Chair and National Office as to the seriousness of the breach, action to be taken and, where necessary, the Information Commissioner's Office would be notified. The Committee shall also contact the relevant U3A members to inform them of the data breach and actions taken to resolve the breach.

Where a U3A member feels that there has been a breach by the U3A, a committee member will ask the member to provide an outline of the breach. If the initial contact is by telephone, the committee member will ask the U3A member to follow this up with an email or a letter detailing their concern. 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 support or if the breach is serious they should notify National Office. The U3A member should also be informed that they can report their concerns to National Office if they don't feel satisfied with the response from the U3A. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.