

Beckenham U3A General Data Protection Regulation Policy

Introduction

This policy is governed by the General Data Protection Regulation (“GDPR”) and applies to the work of Beckenham U3A and details how personal information is gathered, stored and processed in accordance with GDPR. It will be reviewed regularly and amended where necessary.

This policy should be read in conjunction with Beckenham U3A’s Privacy Statement.

The U3A is run by members for members. It is the means of bringing together individuals with specific interests for the purpose of forming interest groups. Data is used to fulfil this function.

1 Principles

GDPR applies to personal data (i.e. information that can identify an individual) whether held in digital or paper form. GDPR identifies the following key data protection principles:

- (a) data shall be processed lawfully, fairly and transparently;
- (b) data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; (further processing for archiving for such reasons as historical and statistical purposes is not considered incompatible with the initial purpose);
- (c) data must be adequate, relevant and limited to what is necessary;
- (d) data must be accurate, kept up to date and amended or deleted without delay following notification;
- (e) data must not be retained for longer than needed to fulfil the purposes for which collected, save for the archiving as detailed above; and
- (f) data must be processed in a manner that ensures security including protection against unauthorised or unlawful processing.

2 Legal basis

Beckenham U3A has selected Consent of Members as the legal basis for the collection, storage and processing of personal data. Beckenham U3A collects personal details from members who have given such consent in order to communicate with them about activities and events run by members for other members. This information will be sent by any of the communication methods that have been supplied including address, telephone (landline and mobile) and email.

3 Uses of data

- (a) Communication about events and activities of Beckenham U3A run by it and its Group Leaders.

- (b) Forwarding information about National, Regional, Third Age Trust and Local events and activities.
- (c) Enabling the liaison between members and Group Leaders.
- (d) Contacting members about their specific interests and skills as they have detailed on their Membership Form to enable the setting up of new groups.
- (e) Ensuring, should they so wish, that members receive the magazine *Third Age Matters* through a third party distributor (after having given specific consent to the same).
- (f) Any such use as shall be consistent with the purposes of the U3A.
- (g) Any extension or change in use outside these parameters will be notified to members before implementation, and consent obtained.

4 Membership rights

Beckenham U3A will ensure that members' information is managed in such a way as not to infringe their rights which include the right:

- (a) to be informed;
- (b) of access;
- (c) of rectification;
- (d) to erasure;
- (e) to restrict processing;
- (f) to object.

5 Information collected

Members will be asked to supply relevant information so that they can participate fully in U3A events and activities. This currently includes: address, telephone numbers, email addresses, interests and skills, plus membership of other U3As.

Members will not be penalised in any way should they decline to provide any such information but may not receive Beckenham U3A information so speedily.

Where additional information is required for insurance or other such purposes (for example for trips and holidays) including health and next of kin details, these will not be retained beyond the time when the purpose for collection is fulfilled.

6 Photographs

NB This only applies where there is an intention to publicise or circulate.

Where photographs are taken, whether of individuals or groups, with the intention of publicly disseminating them, whether in print or online, then those members in the photograph will be

informed of this intention and have the opportunity to remove themselves from the photograph before it is taken or be deleted from the photograph if it has been.

7 Updating

All members are asked to inform the Membership Secretary in writing of any changes to their personal data.

All members have the right at any time to require the removal of all or any selected data. For the avoidance of doubt and to avoid errors, this request must be in writing and sent to the Membership Secretary.

The data retained by Beckenham U3A will be kept up to date and removed when the need for its retention ceases.

APPENDIX I

Guidelines for Committee Members and Group Leaders

- The only people able to access data covered by this policy must be those who need to communicate with or provide a service to Beckenham U3A's members.
- Beckenham U3A will provide induction training to committee members and group conveners to help them understand their responsibilities when handling data.
- Committee Members and group conveners must keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used and they must not be shared outside Beckenham U3A.
- Data must not be shared outside the U3A unless with prior consent and/or for specific and agreed reasons. An example would be information provided to the distribution company for the Third Age Trust's publications.
- Member information should be refreshed periodically to ensure accuracy, via the membership renewal process or when policy is changed.
- Additional support will be from the Third Age Trust where uncertainties or incidents regarding data protection arise.

APPENDIX II

Accountability and Governance

Beckenham U3A's Committee Members are 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 receive an induction into the requirements of GDPR and the

implications for their role. Beckenham U3A will also ensure that group conveners 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 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 Conveners relinquish their roles, they will be asked to pass on data to those who need it and/or to delete data.

APPENDIX III

Data Breach Notifications

Were a data breach to occur, action shall be taken to minimise the harm. Beckenham U3A Committee Members will be made aware of the situation. The Committee will then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The Chair of the U3A will contact National Office within 24 hours of the breach occurring and take such steps as are necessary to repair or rectify the breach. Where necessary, the Information Commissioner's Office would be notified. The Committee will also contact the relevant U3A members to inform them of the data breach and actions taken to resolve the breach.

Where a U3A member considers that there has been any breach, that member will be asked to provide details in writing of the said breach. 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.

Policy review date: 1 October 2021