

Belfast U3A Data Protection Policy

SCOPE OF THE POLICY

This policy applies to the work of Belfast U3A. The policy sets out the requirements that Belfast U3A 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 by Belfast U3A committee members to ensure that the U3A is compliant. This policy should be read in tandem with Belfast U3A's Privacy Policy.

WHY THIS POLICY EXISTS

This data protection policy ensures Belfast U3A:
Complies with 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 CONVENORS

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the Belfast U3A members.
- Belfast U3A will provide induction training to committee members and group convenors to help them understand their responsibilities when handling data.
- Committee Members and group convenors should keep all data secure, by taking sensible precautions and following the guidelines below.
- Members should not share any other member's data without their previous permission.
- Strong passwords must be used and they should never be shared.
- Personal data should not be shared outside of the U3A unless with prior consent and/or for specific and agreed reasons. Examples would include Gift Aid information provided to HMRC or information provided to the distribution company for the Trust publications.
Member information should be refreshed periodically to ensure accuracy.
- Third Age Trust will provide support where uncertainties or incidents regarding data protection arise.

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; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

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

Principle 4 – Personal data held should be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

Principle 5 – Personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;

Principle 6 - Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Lawful, fair and transparent data processing

Belfast U3A requests personal information from members and potential members for membership applications to send communications about their involvement with the U3A. The forms used to request personal information will contain a privacy statement informing potential members and members why the information is being requested and what the information will be used for. Without this information Belfast U3A would be unable to inform members about opportunities arising from their membership. In addition members will be asked to provide consent for their data to be held, and a record of this consent along with membership information will be securely held.

Where the members' information has to be shared with an outside supplier to provide a service, members are asked for specific consent to share their information. Members can withdraw such consent at any time and this will be acted on promptly.

Processed for specified, explicit and legitimate purposes

Members are informed as to how their information is used and the Committee of Belfast U3A seeks to ensure that member information is not used inappropriately.

Appropriate use of information provided by members will include:

- Communicating with members about Belfast U3A events and activities
- Group convenors communicating with group members about specific group activities
- Adding members' details to the direct mailing information for the Third Age Trust magazines – Third Age Matters
- Sending members information about Third Age Trust and Northern Ireland Region of U3As 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

Belfast U3A will ensure that group convenors 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.

Belfast U3A ensures 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
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

Adequate, relevant and limited data processing

Members of Belfast U3A are asked to provide relevant information for membership purposes only. This will include:

- Name (title, names and surname)
- Name wished to be known by
- Postal address
- Email address
- Telephone number
- Mobile number
- Gift Aid entitlement

Where additional information may be 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 Belfast U3A organises a trip or activity that requires next of kin information to be provided, Belfast U3A requires the member to have consent from the identified next of kin for their information to be shared for the purpose of supporting and safeguarding the member in question. If this information is needed for a particular trip or event then the information will be deleted once that event or trip has taken place, unless the member and their next of kin agree it may be kept for longer.

There may be instances where a member's data needs to be shared with a third party due to an accident or incident involving statutory authorities. Where it is in the best interests of the member or if Belfast U3A has significant concerns, then Belfast U3A does not have to obtain consent.

Photographs

Photographs are classified as personal data. 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 (oral or written) 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 webmaster via the website to advise that they no longer wish their photograph to be displayed.

Accuracy of data and keeping data up-to-date

Belfast U3A has a responsibility to ensure members' information is kept up to date. Members are advised to let the membership secretary know at any time if any of their personal information changes.

Accountability and governance

Belfast U3A Committee has a responsibility for ensuring that Belfast U3A remains compliant with data protection requirements and can evidence that it has. For this purpose those from whom data is required will be asked to provide written consent. The evidence of this consent will then be held securely as evidence of compliance.

Belfast U3A Committee ensures that new members joining the Committee receive an induction about how data protection is managed within Belfast U3A and the implications for their role. Committee Members will 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.

The Committee also advises Group Convenors about their responsibilities in relation to the data they hold and process. On relinquishing their roles, they will be asked to either pass on data to those who need it and/or delete data.

Secure Processing

Belfast U3A Committee ensures that data is both securely held and processed. This includes:

- Advising committee members and Group convenors using appropriate security on laptops, PCs and other devices that contain or access personal information.
- Restricting access of sharing member information to those who need to know and limiting their access to the range of data they need.
- Using appropriate security when sharing data between committee members and/or group convenors.
- Shredding paper records when they are no longer required.

Belfast U3A uses services with the following 3rd party data processors

- *"Doing More"* the company contracted by the Third Age Trust to print and distribute the Third Age Matters Magazine.
- M^cGrath Office Supplies for printing the Belfast U3As monthly newsletter.

Subject Access Request

U3A members are entitled to request access to the information that is held by Belfast U3A about them. The request needs to be a written request to the Membership Secretary of the U3A. On receipt, the request will be formally acknowledged and dealt with within 14 days, unless there are exceptional circumstances as to why the request cannot be granted. Belfast U3A will provide 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 would be taken to minimise the harm. This will include ensuring that all Belfast 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 Chairperson of Belfast U3A shall contact the National Office of The Third Age Trust within 24 hours of knowing that the breach occurred to notify of the breach. A discussion will take place between the Chairperson and National Office as to the seriousness of the breach, action to be taken and, where necessary, the Information Commissioner's Office (Northern Ireland) 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.

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

Availability and Changes to this policy : This policy is available on our website <https://u3asites.org.uk/belfast> This policy may change from time to time. If we make any material changes we will make members aware via the monthly members' meetings and the monthly members' newsletter.

Contact

If you have any queries about this policy, need it in an alternative format, or have any complaints about our privacy practices, please contact the Membership secretary by email at membership@belfastu3a.org

This policy was approved by the committee on 19th November 2018 and will be reviewed as necessary.

(The Third Age Trust provided the draft for this policy)