

# **Bishop's Cleeve u3a**

## **Data Protection Policy**

### **1. Scope of the policy**

This policy applies to the work of Bishop's Cleeve u3a. The policy sets out the requirements that Bishop's Cleeve u3a has to collect and process information for membership purposes. The policy details how personal information will be collected, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed annually by Bishop's Cleeve u3a Trustees to ensure that Bishop's Cleeve u3a remains compliant. This policy should be read in tandem with Bishop's Cleeve u3a Privacy Policy.

### **2. Why this policy exists**

This data protection policy ensures Bishop's Cleeve 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

### **3. General guidelines for Trustees and other data users**

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to Bishop's Cleeve u3a members including (but not exclusively) Trustees, Group Leaders and the Beacon Administrator.
- Approved data users should only have access to the data they need in order to fulfil their duties.
- Bishop's Cleeve u3a will provide induction training to Trustees and Group Leaders to help them understand their responsibilities when handling data.
- All those with access 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 of the Trustees 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 via the membership renewal process or when policy is changed.
- Additional support will be available from the Third Age Trust where uncertainties or incidents regarding data protection arise.

### **4. Data protection principles**

The General Data Protection Regulation identifies key principles with regard to personal data, namely:

1. Personal data shall 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. 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.
3. Personal data collection must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
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 is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
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 is 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.

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.

## **5. Lawful, fair and transparent data processing**

Bishop's Cleeve u3a requests personal information from potential members and members for processing membership applications and for sending communications regarding members' involvement with the u3a. Members will be informed as to why the information is being requested and what the information will be used for.

The lawful basis for obtaining member information is due to the legitimate interest relationship that the u3a has with individual members. In addition, members will be asked to provide consent for specific processing purposes such as the taking of photographs (see section 8).

Bishop's Cleeve u3a members will be informed as to who they need to contact should they wish for their data not to be used for specific purposes for which they have provided consent. Where these requests are received, they will be acted upon promptly and the member will be informed as to when the action has been taken.

## **6. Processed for specified, explicit and legitimate purposes**

Members' personal information is stored securely on the Beacon database: <https://beacon.u3a.org.uk/terms/> Members will be informed as to how their information will be used and the Trustees of Bishop's Cleeve u3a will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include but will not be limited to:

- Communicating with members about Bishop's Cleeve u3a events and activities.
- Group Leaders communicating with group members about specific group activities.
- Distributing (by an external company) of the Trust publication – Third Age Matters. Members will be informed and have a choice as to whether or not they wish to receive the publication.
- Sending members information about other u3as, clusters of u3as and 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.
- Distributing (by an external company) of The Clarion, Bishop's Cleeve u3a's newsletter.

Bishop's Cleeve 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.

Bishop's Cleeve u3a will ensure that members' information is managed in such a way as to not infringe an individual member's rights which include the right:

- to be informed
- of access
- to rectification
- to erasure in certain circumstances (see Privacy Policy for details)
- to restrict processing
- to data portability
- to object

## **7. Adequate, Relevant and Limited Data Processing**

Members of Bishop's Cleeve 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
- Bank details to pay expenses and for direct debit purposes

Where additional information may be required such as emergency contact information a full Legitimate Interest Assessment will be completed in order to request this information. Members will be informed the assessment has been completed.

## **8. Photographs**

Photographs are classified as personal data. Photographs are taken for use on our website, social media and other publicity. Members should advise the Beacon Administrator if they do not wish to be included in the group's photographs and tell the photographer or organiser if they do not wish to be included. They should move out of shot at an event while photographs are being taken. Should a member wish at any time to have their photograph removed from publicity then they should contact the Beacon Administrator.

## **9. Accuracy of data and keeping data up-to-date**

Bishop's Cleeve u3a has a responsibility to ensure members' information is kept up to date. Members will be informed that they should update their personal information by logging onto Beacon or by notifying the Membership Secretary. In addition, on an annual basis, the membership renewal process will provide an opportunity for members to inform Bishop's Cleeve u3a as to any changes in their personal information.

## **10. Accountability and governance**

- Bishop's Cleeve u3a Trustees 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.
- Bishop's Cleeve u3a Trustees will ensure that members becoming trustees receive an induction into the requirements of GDPR and the implications for their role.
- Bishop's Cleeve u3a Trustees will also ensure that approved data users (including Group Leaders) are made aware of their responsibilities in relation to the data they hold and process.
- Bishop's Cleeve u3a Trustees will stay up to date with guidance and practice within the u3a movement and will seek advice from the Third Age Trust National Office should any uncertainties arise.
- Bishop's Cleeve u3a Trustees will review data protection requirements annually as well as reviewing who has access to data and how data is stored and deleted.
- When Bishop's Cleeve u3a Trustees and approved data users relinquish their roles, they will be asked either to pass on data to those who need it and/or to delete data.
- Bishop's Cleeve u3a Trustees will ensure that use of personal data on its website, in Clarion and in its social media complies with the stated u3a policies and principles.

## **11. Secure Processing**

Bishop's Cleeve u3a Trustees have a responsibility to ensure that data is both securely held and processed. This will include:

- Approved data users using strong passwords
- Approved data users not sharing passwords
- Restricting access to information to approved data users
- Using password protection on laptops, tablets, PCs or mobile phones that contain personal information
- Using password protection, a membership database or secure cloud systems when sharing data between approved data users

- Trustees will ensure that they have installed on their laptops and other devices recognised firewall security and virus protection software such as Microsoft Defender or AVG. This will be kept up to date.

## **12. Subject Access Request**

u3a members can access their personal information at any time by logging on to Beacon. They are also entitled to make a written request to the Membership Secretary of Bishop's Cleeve u3a for a copy of information which is held on them. On receipt the request will be formally acknowledged and dealt with within one month unless there are exceptional circumstances as to why the request cannot be granted. The Membership Secretary will provide a written response detailing all information held on the member. A record will be kept of the date of the request and the date of the response.

## **13. Data Breach Notification**

If a data breach occurs, action will be taken to minimise the harm. This will include ensuring that all Bishop's Cleeve u3a Trustees are made aware that a breach has taken place and how the breach occurred. The Trustees will then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The Chair of Bishop's Cleeve u3a will contact the Third Age Trust as soon as possible after the breach has occurred to notify of the breach. A discussion will take place between the Chair and Third Age Trust as to the seriousness of the breach and action to be taken and, where necessary, the Information Commissioner's Office will be notified. The Trustees will also contact the relevant u3a members to inform them of the data breach and actions taken to resolve the breach.

Where a member feels that there has been a breach by the u3a, the Chair of Bishop's Cleeve u3a will ask the member to provide an outline in writing of the breach. The alleged breach will then be investigated by Bishop's Cleeve u3a Trustees who are not in any way implicated in the breach. Where the Trustees need support or if the breach is serious, they should notify the Third Age Trust. The u3a member should also be informed that they can report their concerns to the Third Age Trust if they are dissatisfied with the response from the Bishop's Cleeve u3a branch. 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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**Policy approved: February 2<sup>nd</sup> 2024**

**To be reviewed: February 2025**