

Branston & District U3A

Data Protection Policy

Scope of the policy

This policy applies to the work of Branston & District U3A. The policy sets out the requirements that Branston & District 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 Branston & District U3A committee members to ensure that we are compliant. This policy should be read in tandem with Branston & District U3A's Privacy Policy.

Why this policy exists

This data protection policy ensures Branston & District 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 conveners

- 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 Branston & District U3A members.
- Branston & District 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 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/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 provided by the Third Age Trust 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

Branston & District U3A requests personal information from members and potential members for membership applications and for sending communications about their involvement with the U3A. The forms used to request personal information will contain a privacy statement informing members and potential members 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 contractual relationship that the U3A has with individual members. In addition members will be asked to provide consent for specific processing purposes. 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.

Processed for specified, explicit and legitimate purposes

Members will be informed as to how their information will be used and the Committee of Branston & District 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 Branston & District U3A events and activities
- Group conveners 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 might arise during the course of their membership

Branston & District U3A will ensure that group conveners 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.

Branston & District 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
- 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 Branston & District 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

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 Branston & District U3A organises a trip or activity that requires next of kin information to be provided, a legitimate interest assessment (link) will have been completed in order to request this information. Members will be made aware that the assessment has been completed.

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 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 Branston & District to advise that they no longer wish their photograph to be displayed.

Accuracy of data and keeping data up-to-date

Branston & District U3A has a responsibility to ensure members' information is kept up to date. Members will be informed to let the membership secretary know if any of their personal information changes. In addition, on an annual basis, the membership renewal process will provide an opportunity for members to inform Branston & District U3A as to any changes in their personal information.

Accountability and governance

The U3A Committee 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. Branston & District 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 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 Conveners relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

Secure Processing

Branston & District 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 conveners
- Paying for firewall security to be put onto Committee Members' laptops or other devices.

Subject Access Request

U3A members are entitled to request access to the information that is held by Branston & District U3A. The request needs to be received in the form of a written request to the Data Manager of the U3A. On receipt of the request, the request will be formally acknowledged and dealt with within 7 days unless there are exceptional circumstances as to why the request cannot be granted. Branston & District 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 shall be taken to minimise the harm. This will include ensuring that all Branston & District 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.

Actions – Committee Members

- Will determine what data items are to be recorded for the management of the U3A and for accounting purposes; and review such items as necessary.
- Will appoint a Data Manager.
- Will receive such information on members' details as are necessary for the fulfilment of their responsibilities by means of membership application forms on which the ways in which personal information is used is clearly indicated.
- Consent contract to be required at initial membership application and at annual renewal of membership using the form;
Branston & District U3A processes member information so that we can keep you informed about events, groups and activities as part of your membership. Branston U3A's lawful basis for collecting this information is legitimate interest/contract. In processing your information Branston & District U3A will: store it securely for membership purposes; communicate with you as a U3A member; share with group leaders for those groups of which you are a member; send you general information about the Third Age Trust (the national organisation to which U3As are affiliated).
- Written consent forms to be retained as evidence of compliance.
- Will ensure the security of such data on password protected computing equipment with suitable firewall(s).
- Will ensure that members' information is used only for the administration of Branston & District U3A and normally within Branston & District U3A but also including Third Age Trust, distributors of Third Age Trust publications and HMRC with regard to Gift Aid.
- Will ensure that additional consent is gained in case of need for third parties such as travel companies.
- Will ensure that Members' information is NOT made available to third parties (except as specified above), and never used for marketing purposes.
- Will ensure that Members are notified of what data is recorded and the purposes for which it is used.
- Will ensure that members' email addresses are not disclosed to other members when emails are distributed to multiple members by using blind copies (BCC) unless specific permission has been granted by ALL members of the circulation group has been given and recorded.
- Will receive members' enquiries regarding what data is held, requests to amend or delete data and complaints regarding data held and its usage. Any such enquiries or complaints will elicit a response within seven days and will normally be dealt with by the Data Manager.
- Will notify members of whom to contact in case of enquiry or complaint, normally the Data Manager either directly or via a member of the committee.
- Will ensure that proceedings of any meetings concerned with complaints are recorded accurately and fairly.
- Will notify members of the need to notify the Data Manager of any amendments to their personal information, such change of address.
- Will ensure that all computer files containing personal data distributed by email or similar means will be password protected.

Beacon Membership Database System

In September 2019, Branston & District U3A adopted the Beacon Membership Database system which is provided by Third Age Trust. The Beacon System stores personal data about members of the participating U3As within its database (the Personal Data). The Personal Data include the names, addresses, telephone numbers and email addresses of U3A members, and the System may store other data related to their activities within the U3A. The Trust acts as a processor of the Personal Data on behalf of the relevant participating U3A (as controller) in the performance of the Trust's obligations under this agreement.

Third Age Trust Beacon Team set out their data protection responsibilities within their Terms and Conditions, to be found at <https://beacon.u3a.org.uk/terms/>.

In addition to other conditions set out in this document, the following applies to the use of Beacon;

- Access to Beacon is limited to authorised Users, authorised National Office staff, Beacon Team members and Contractor-authorised employees as described in 5.1 of the Beacon Terms and Conditions.
- Personal data collected must be processed in compliance with all applicable laws including, but not limited to, the Data Protection Law.
- Appropriate technical and organisational measures must be taken against the unauthorised or unlawful access and processing of personal data and against the accidental loss or destruction of, or damage to, personal data and as required by the Data Protection Law.
- Access to data within the U3A is controlled by the Administrators. User names, passwords and the privileges associated with each User role are allocated by the Administrators.
- Each User MUST ensure that their password is kept securely and secret from others.
- The Administrators ensure that any person granted specific access provides written assurances that adequate security measures have been taken to keep their computer free of viruses and other malware which might enable unauthorised access to Beacon.
- The Administrators MUST ensure that any User granted specific access provides written assurances confirming that they will not allow any other person to use or to have access to their Beacon account. In particular, a shared computer must not be used to access a Beacon account unless the User has a personal logon for the shared computer.
- Access to the System via a public computer, e.g. in a public library, is strictly prohibited.
- The Executive Committee is required to promptly notify the Trust in writing of each personal data breach (as defined by the GDPR) of which we become aware.
- The list of data items recorded, as detailed in appendix 1, remains in place following the adoption of the Beacon System.

Actions – Data Manager (including Deputy Data Manager)

- As part of the Committee will conform to the rules laid out for Committee members.
- Will maintain the full database of members' information.
- Will be solely responsible for processing and controlling access to data, together with any appointed deputies (who must be members of the committee or ex officio and approved by the Trustees).
- Will ensure security and integrity of members' data by use of appropriate software and password protected computing equipment with suitable firewall(s).
- Will ensure that Committee Members, Group Convenors and members have information necessary and commensurate for the fulfilment of their responsibilities.
- Will advise committee members and members of how to maintain security and safe working.
- Will, at the time of membership renewal and upon request, disclose what data items are recorded for each member.
- **Will maintain oversight of Beacon Membership Database System**

Actions – Group Convenors

- **Will conform to the conditions detailed above, including those relating to Beacon Membership Database System.**
- Will hold data ONLY on members of the group(s) of which they are convenors.
- Will ensure that group members' email addresses are not disclosed to other group members when emails are distributed to multiple members by using blind copies (BCC) unless specific permission has been granted by ALL members of the circulation group has been given and recorded.
- Will ensure the security of such data on password protected computing equipment with suitable firewall(s).
- Will ensure the security of hard-copy members' data, e.g. by keeping group members' emergency contact details in sealed envelopes.
- Will destroy or delete out of date lists of group members and associated data.
- On relinquishing the role of convenor will destroy or delete out of date lists of group members and associated data.
- Will notify the committee if personal data other than that provided by the Data Manager is being recorded.

Appendix 1 – List of Data Items kept on Branston & District U3A Membership Database.

Data Item	Pre May 2018	Post May 2018	Comments
Forename/Surname	Yes	Yes	
Badge name	Yes	Yes	
Title	Yes	Yes	
Address/Post Code	Yes	Yes	
Phone/Mobile number	Yes	Yes	
Email address	Yes	Yes	
Date of Birth	Yes	No	
Gender	Yes	No	
Marital Status	Yes	No	
Emergency Contact	Yes	Yes	
Comments	Yes	Yes	Used internally as aide-memoire in some circumstances if non-medical notes are helpful.
Health Information	Yes	Yes	In case of emergency, if supplied.
TAM Mailing List	Yes	Yes	Shows whether Member is eligible to receive TAM on Branston U3A capitation.
Mail with	Yes	Yes	Indicates who is paired with whom at same address for mailing purposes.
Committee Member	Yes	Yes	Helps with badge production
Position within U3A	Yes	Yes	Helps with badge production, including Convenors.
Gift Aid	Yes	Yes	Needed for Gift Aid claims
Fee Paid	Yes	Yes	Needed for Gift Aid Claims and evidence of Membership
Other U3A/ Name of	Yes	Yes	Evidence of reduced fees payable
Capitation Fee Payable	Yes	Yes	Indicates who is solely Branston & District Member.
Membership Number	Yes	Yes	Unique Identifier for internal database use.
Date updated	Yes	Yes	Indicates how recently data is updated
Group(s) Joined	Yes	Yes	Enables management of Groups
Photo	Yes	Yes	Usually Group Convenors for easy identification by new members

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