

Bushey & District U3A

Data Protection Policy

Scope of the policy

This policy applies to the work of Bushey & District U3A. The policy sets out the requirements that Bushey & 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 Bushey & District U3A Committee Members to ensure that we are compliant. This policy should be read in conjunction with Bushey & District U3A's Privacy Policy.

Why this policy exists

This data protection policy ensures Bushey & 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 Study 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 Bushey & District U3A Members.
- Data should not be shared informally.
- Committee Members and Study Group Leaders 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 Bushey & District 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 Third Age 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.

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

Principle 4 – Personal data held should be accurate and 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;

Principle 5 – Personal data must be kept in a form which permits identification of data subjects for no longer than is necessary.

Principal 6 – Personal data must be processed in accordance with the individual's rights.

Principle 7 - 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

Bushey & District U3A requests personal information from potential Members and Members for membership applications and for sending communications about their involvement with Bushey & District U3A. A full membership list will only be held by the Chairman, Membership Secretary and the Study Group Co-ordinator. In addition, the Treasurer holds as much of the data as is necessary to apply for Gift Aid and to enable registration of members' attendance at monthly meetings. The forms used to request personal information will contain a privacy statement informing potential Members and 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 Bushey & District U3A has with individual Members. In addition, Members will be asked to provide consent for specific processing purposes. 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.

Processing for specified, explicit and legitimate purposes

Members will be informed as to how their information will be used and the Committee of Bushey & 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 Bushey & District U3A events and activities.
- Study Group Leaders communicating with group Members about specific group activities.
- Members contacting Study Group Leaders in respect of study groups and their activities,
- Use of Members' details for the direct mailing of 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.

Bushey & District U3A will ensure that Study Group Leaders are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending Bushey & District U3A members marketing and/or promotional materials from external service providers.

Bushey & 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 Bushey & District U3A will only be asked to provide information that is relevant for membership purposes. This will include:

- Name
- Postal address
- Email address
- Telephone numbers
- Gift Aid 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. If photographs are to be displayed or published (whether on the web, newsletter or otherwise prior to publication) written consent will be obtained from Members by Study Group Leaders before publication takes place and Members informed as to where photographs will be displayed or published. Should a Member wish at any time to remove their consent and to have their photograph removed from the web then they should contact the Webmaster to advise that they no longer wish their photograph to be displayed. The Study Group Leaders are responsible for using and keeping the consent forms.

Accuracy of data and keeping data up-to-date

Bushey & District U3A has a responsibility to ensure Members' information is kept up to date. Members are responsible for letting the Membership Secretary know if any of their personal information changes as soon as possible. In addition at membership renewal Members will be asked to confirm or amend their personal details.

Accountability and governance

Bushey & District U3A Committee are responsible for ensuring that Bushey & District 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 Bushey & District U3A Committee will ensure that new Members joining the Committee receive an induction into the requirements of GDPR and the implications for their role. Bushey & District U3A will also ensure that Study Group Leaders are made aware of their responsibilities in relation to the data they hold and process. Committee Members will 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 Study 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

Bushey & District U3A Committee Members have a responsibility to ensure that data is both securely held and processed. This can include:

- Committee Members not sharing passwords
- Restricting the sharing of information to those on the Committee who need to communicate with Members on a regular basis or who need it for legal and regulatory reasons
- Using strong password protection on laptops and PCs that contain personal information
- Keeping any paper copies containing personal data secure and private

Subject Access Request

Bushey & District U3A Members are entitled to request access to the information that is held by Bushey & District U3A. The request needs to be received in the form of a written request to the Membership Secretary of Bushey & District 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) unless there are exceptional circumstances as to why the request cannot be granted. Bushey & 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 Bushey & 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 Chairman of Bushey & District U3A shall contact National Office within 24 hours of the breach occurring to notify of the breach. A discussion will take place between the Chairman 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 Bushey & District U3A Member to inform them of the data breach and actions taken to resolve the breach.

Where a Bushey & District U3A Member feels that there has been a breach by Bushey & District 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 Member to follow this up with an email or a letter detailing their concern. The alleged breach will then be investigated by Committee Members 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 Member should also be informed that they can report their concerns to National Office if they don't feel satisfied with the response from Bushey & District U3A. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.