

# The Cranleigh And District U3A Data Protection Policy

## Scope of the policy

This policy applies to the work of The Cranleigh And District U3A ('Cranleigh U3A'). The policy sets out the requirements that Cranleigh 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 ('GDPR'). The policy is reviewed on an ongoing basis by the Management Committee (the 'Management Committee') of Cranleigh U3A to ensure that Cranleigh U3A remains compliant. This policy should be read in tandem with Cranleigh U3A's Privacy Policy.

## Why this policy exists

This data protection policy ensures that Cranleigh 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 Management Committee members and 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 Cranleigh U3A members.
- Cranleigh U3A will provide induction training to Management Committee members and Group Leaders to help them understand their responsibilities when handling data.
- Management Committee members and 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 Cranleigh 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 (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 Trust where uncertainties or incidents regarding data protection arise.

## Data protection principles

The GDPR 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 it is 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 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 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.

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

Cranleigh U3A requests personal information from potential members and members for membership applications and for sending communications about their involvement with Cranleigh U3A. 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 for what purpose or purposes the information will be used. The lawful basis for obtaining member information is due to the contractual relationship that Cranleigh U3A has with individual members. In addition, members will be asked to provide consent for specific processing purposes, such as the taking of photographs. Cranleigh U3A members will be informed as to whom 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 Management Committee will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about Cranleigh U3A events and activities
- Group Leaders 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 Trust magazine – *Third Age Matters*
- Sending members information about events and activities organised by the Trust
- 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

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

Cranleigh U3A will ensure that members' information is managed in such a way as not to infringe an individual member's 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 Cranleigh U3A will only be asked to provide information that is relevant for membership purposes. This will include:

- Name and title
- Postal address
- Email address
- Telephone number
- Gift Aid entitlement
- Subscription preferences
- Willingness to lead a group, or assist in the administration of Cranleigh U3a (optional)
- Emergency contact details (optional)

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 for which it will be used.

Where Cranleigh U3A organises a trip or activity that requires next of kin information to be provided, a legitimate interest assessment will have been completed in order to request this information.

## Photographs

Photographs are classified as personal data. Where group photographs are being taken members will be asked to step out of shot if they do not 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, they should contact the Cranleigh U3A Secretary to advise that they no longer wish their photograph to be displayed.

## Accuracy of data and keeping data up to date

Cranleigh U3A has a responsibility to ensure members' information is kept up to date. Members will be asked to update their information via the Beacon Members Portal or to inform the Membership Secretary 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 the Membership Secretary of any changes in their personal information.

## Accountability and governance

The Management Committee is responsible for ensuring that Cranleigh U3A remains compliant with data protection requirements. Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely. The Management Committee will ensure that new members joining the Management Committee receive an induction into the requirements of GDPR and the implications for their role. Cranleigh U3A will also ensure that Group Leaders are made aware of their responsibilities in relation to the data they hold and process. Management Committee members shall also stay up to date with guidance and practice within the U3A movement and shall seek additional input from the Trust should any uncertainties arise. The Management Committee will review data protection and who has access to information on a regular basis as well as reviewing what data is held. When Management Committee members and 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

Management Committee members have a responsibility to ensure that data is both securely held and processed. This will include:

- Using the Beacon system to securely store member's information and to send bulk emails to members
- Management Committee members using strong passwords
- Management Committee members not sharing passwords
- Restricting access to or sharing of member information to those on the Management 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 Management Committee members and/or Group Leaders

## Subject Access Request

Cranleigh U3A members are entitled to request access to the information that is held by Cranleigh U3A. The request needs to be in writing to the Membership Secretary. On receipt, the request will be formally acknowledged and dealt with promptly (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. Cranleigh 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

If a data breach occurs, action shall be taken to minimise the harm. This will include ensuring that all Management Committee members are made aware that a breach has taken place and how the breach occurred. The Management Committee shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The Chair of Cranleigh U3A shall contact the Trust within 24 hours of the breach occurring to notify of the breach. A discussion will take place between the Chair and the Trust as to the seriousness of the breach, action to be taken and, where necessary, the Information Commissioner's Office will be notified. The Management Committee shall also contact the relevant Cranleigh U3A members to inform them of the data breach and actions taken to resolve the breach.

Where a Cranleigh U3A member feels that there has been a breach by Cranleigh U3A, a Management Committee member will ask the member to provide an outline of the breach. If the initial contact is by telephone, the Management Committee member will ask the Cranleigh 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 Management Committee who are not in any way implicated in the breach. Where the Management Committee needs support, or if the breach is serious, they will notify the Trust. The Cranleigh U3A member will also be informed that they can report their concerns to the Trust if they do not feel satisfied with the response from Cranleigh U3A. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.