

## Scope of the policy

This policy applies to the Culm Valley U3A (CVU3A). The policy sets out the requirements that CVU3A has to collect and process information for membership purposes and 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 on an ongoing basis by CVU3A committee members to ensure that CVU3A remains compliant.

CVU3A endeavours to abide by the 6 Data Protection Principles identified in the General Data Protection Regulations.

## Why this policy exists

This data protection policy ensures CVU3A:

- 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 are those who need to communicate with, or provide a service to, CVU3A members.
- CVU3A will ensure committee members and group convenors understand their responsibilities when handling data.
- Committee Members and group convenors will keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used and they should never be shared. (Example of a strong password Pg\$iuTR!73nH)
- Data should not be shared outside of the CVU3A 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 available from the Third Age Trust where uncertainties or incidents regarding data protection arise.

## Lawful, fair and transparent data processing

CVU3A requests personal information from potential members and members for membership applications and for sending communications regarding members' involvement with the CVU3A/U3A.

Members are 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 CVU3A has with individual members.

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 CVU3A will seek to ensure that member information is not used inappropriately.

Appropriate use of information provided by members will include:

- Communicating with members about CVU3A/U3A events and activities
- Group convenors communicating with group members about specific group activities
- Member information will be provided to the distribution company that sends out 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 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

CVU3A will ensure that group convenors are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending CVU3A members marketing and/or promotional materials from external service providers.

CVU3A 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 CVU3A will only be asked to provide information that is relevant for membership purposes. This will include:

- Name
- Postal address
- Email address
- Landline telephone number
- Mobile 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.

### **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 the Groups Co-ordinator, in the first instance, to advise that they no longer wish their photograph to be displayed.

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

CVU3A 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 CVU3A of any changes in their personal information..

### **Accountability and governance**

CVU3A Committee are responsible for ensuring that the CVU3A 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.

CVU3A Committee will:

- ensure that new members joining the Committee receive an induction into the requirements of GDPR and the implications for their role.
- ensure that group convenors are made aware of their responsibilities in relation to the data they hold and process. Committee Members 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.
- review data protection requirements on an ongoing basis as well as reviewing who has access to data and how data is stored and deleted. When Committee Members and Group Convenors relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

### **Secure Processing**

CVU3A Committee Members have a responsibility to ensure that data is both securely held and processed. This will include:

- Committee members using strong passwords (Example of a strong password Pg\$iuTR!73nH)
- 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, a membership database or secure cloud systems when sharing data between committee members and/or group convenors
- Paying for firewall security to be put onto Committee Members' laptops or other devices.

### **Subject Access Request**

CVU3A members are entitled to request access to the information that is held by CVU3A. The request needs to be received in the form of a written request to the Membership Secretary of



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CVU3A. 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. CVU3A 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 will be taken to minimise the harm. This will include ensuring that all CVU3A 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 CVU3A will contact National Office as soon as possible after the breach has occurred 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 CVU3A members to inform them of the data breach and actions taken to resolve the breach.

Where a CVU3A member feels that there has been a breach by the CVU3A, 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 CVU3A 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 CVU3A 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 CVU3A. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

### This policy was adopted on:

Signed:

Committee role:

Print name:

Policy review date: