



# Dulwich and District u3a Data Protection Policy

## 1 Scope of the policy

This policy applies to the work of Dulwich and District u3a. The policy sets out the requirements that Dulwich and District 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 on an ongoing basis by Dulwich and District u3a trustees to ensure that Dulwich and District u3a remains compliant. This policy should be read in tandem with Dulwich and District u3a's Privacy Policy.

## 2 Why this policy exists

This data protection policy ensures Dulwich and 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

## 3 General guidelines for trustees and group convenors

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to Dulwich and District u3a members.
- Dulwich and District u3a will provide induction information and guidance to trustees and group convenors to help them understand their responsibilities when handling data.
- Trustees and group convenors should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used.
- Passwords must not be shared except where more than one nominated officer deals with a particular application using a shared password, as agreed by the Dulwich and District u3a trustees.
- 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, information provided to third party distributors of mailings to members or information provided to the distribution company for the Trust publications.
- 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 data protection principles:

- Principle 1 – lawfulness, fairness and transparency: Personal data must be processed lawfully, fairly and in a transparent manner.
- Principle 2 – purpose limitation: 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 – data minimisation: Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Principle 4 – accuracy: Personal data held must 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 – storage minimisation: 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 – integrity and confidentiality: Personal data must be processed in accordance 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.
- Principle 7 – accountability: This underlies the other six principles. The Data Controller is responsible for complying with data protection legislation and must be able to demonstrate compliance.

The trustees are the Data Controller for Dulwich and District u3a.

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

Dulwich and District u3a requests personal information from potential members and members for 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 contractual and 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. Dulwich and District 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 will be informed as to how their information will be used through the public availability of this policy on the District and District u3a website. The trustees of Dulwich and 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 Dulwich and District u3a events and activities
- Group convenors communicating with group members about specific group activities
- Providing member information 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

Dulwich and District u3a will ensure that group convenors 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.

Dulwich and 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

## **7 Adequate, relevant and limited data processing**

Members of Dulwich and 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 Dulwich and District 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. Members will be made aware that the assessment has been completed.

## **8 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 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 Dulwich and District u3a trustees to advise that they no longer wish their photograph to be displayed.

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

The trustees of Dulwich and District u3a have a responsibility to ensure members' information is kept up to date. The trustees have delegated the Membership Secretary to lead on this matter.

Members can inform the Membership Secretary if any of their personal information changes. In addition, the membership renewal process and other member communications such as surveys, will provide an opportunity for members to inform Dulwich and District u3a as to any changes in their personal information.

## **10 Accountability and governance**

The trustees of Dulwich and District u3a 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. Dulwich and District u3a trustees will ensure that new trustees receive an induction into the requirements of GDPR and the implications for their role. Dulwich and District u3a will also ensure that group convenors are made aware of their responsibilities in relation to the data they hold and process. 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. Dulwich and District u3a trustees will 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 trustees and group convenors relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

## **11 Secure Processing**

Dulwich and District trustees have a responsibility to ensure that data is both securely held and processed. This will include:

- Restricting access of sharing member information to those trustees 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 trustees and/or group convenors
- Not sharing passwords unless more than one officer is authorised to share for the purposes of using a particular application such a database or communication app.
- Checking that trustees' laptops or other devices have firewall security.

## **12 Subject Access Request**

u3a members are entitled to request access to the information that is held by Dulwich and District u3a. The request needs to be received in the form of a written request to the Membership Secretary of Dulwich and District u3a. On receipt of the request, the request will be acknowledged and dealt with expediently (a written response with the information will generally be provided within fourteen days) unless there are exceptional circumstances as to why the request cannot be granted. A record shall be kept of the date of the request and the date of the response.

### **13 Data Breach Notification**

Were a data breach to occur action will be taken to minimise the harm. This will include ensuring that all Dulwich and District u3a trustees are made aware that a breach has taken place and how the breach occurred. The trustees shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The Chair of Dulwich and District u3a 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. Trustees 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 trustee will ask the member to provide an outline of the breach. If the initial contact is by telephone, the trustee 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 trustees who are not in any way implicated in the breach. Where trustees need 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.

### **14 Availability and changes to this policy**

This policy is available on the Dulwich and District u3a website and printed copies may be obtained from the Membership Secretary. The policy will be reviewed every two years or sooner if required by updated legislation or guidance.

<b>Version</b>	<b>Date</b>	<b>Lead Author</b>	<b>Approved by/date</b>	<b>Review date</b>
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