



Dulwich and District u3a Legitimate Interest Assessment

Part 1 – Membership Information: Legitimate Interest Assessment

This legitimate interest assessment has been compiled in order to set out the reasons why Dulwich and District u3a keeps and processes membership information.

1.1 Purpose Test

Dulwich and District u3a requests personal data in order to be able to register individuals for membership of Dulwich and District u3a. The personal data provided will also be used to communicate with members regarding the activities of Dulwich and District u3a and to keep members informed regarding any groups or activities that they undertake with Dulwich and District u3a.

Member information is shared with a third party processor for the supply of the Trust publication – Third Age Matters (TAM). Each member has a choice as to whether they opt to receive this publication. Dulwich and District u3a will also share member data with a third party processor for the purpose of some all member mail-outs of documents relating to meetings, events and interest groups. Other than this Dulwich and District u3a does not share membership information outside of the u3a.

Membership information is securely held and access is restricted to those who need to process data for membership purposes. Storage and processing of membership data is done in line with GDPR and safeguarding requirements. Dulwich and District u3a operates with a data protection policy and privacy statement and has sought advice from the Third Age Trust in developing guidance in respect of our practice in relation to data protection.

1.2 Necessity Test

Dulwich and District u3a requests minimal information from potential members which includes personal details and contact details. This information is proportionate to the requirements of the u3a fulfilling its responsibilities in relation to being able to communicate effectively with its membership. Dulwich and District u3a would not be able to register members or process applications without the provision of a certain amount of membership information. Dulwich and District u3a has a duty of care to its membership and needs to retain a certain amount of personal information in order to

know who its members are and which members are paid up members of the u3a. This is necessary for meeting the requirements of the insurance provision for u3a members.

1.3 Balancing Test

The personal data requested is that which is needed for registering and processing individuals as members of Dulwich and District u3a. The data requested is minimal personal data and that which is needed for communicating with members. All the data gathered is from individuals who provide the information as part of their application to join Dulwich and District u3a. Membership is for a 12 month period at the end of which time members have the option as to whether or not they wish to renew. Members have the opportunity to update their personal information at their membership renewal date and at other times by contacting the Membership Secretary (membership@dulwich-u3a.uk).

The reasons for collecting personal information are explained to potential members at the point of joining. Copies of Dulwich and District u3a's Privacy Policy and Data Protection Policy are available to all members who wish to have further details about how their information is used and who it is shared with.

Members who are unhappy about their data being shared with third party processors are able to opt out of receiving those publications for which a processor is used. Dulwich and District u3a holds information securely and it will only be accessed by those who need to see it. Membership data will not be processed for any purpose other than in connection with an individual's membership. Communications sent will be relevant and targeted to the individual's membership activities. u3a members will not be sent marketing materials or information that does not relate to the u3a.

Dulwich and District u3a group leaders/convenors will be informed of the importance of restricting their communications with members to that which is needed for organisation of the group. All those who process membership information for the u3a will receive an induction into the requirements of GDPR and the restrictions around data processing.

Through compilation of this Assessment Dulwich and District u3a considers that it has a legitimate interest to collect, hold and process membership information. This document will be held by the trustees, accessible on the Dulwich and District u3a website and communicated to the membership, as required. The assessment will be reviewed every 2 years in order to ensure that legitimate interest remains an appropriate lawful basis for gathering membership information.

Part 2 – Emergency Contact Information: Legitimate Interest Assessment

This legitimate interest assessment has been compiled in order to set out the reasons why Dulwich and District u3a requests emergency contact details.

2.1 Purpose Test

The reason that Dulwich and District u3a requests contact details for a member's emergency contact is so that the trustees and/or group convenors know who to contact in the event of an emergency. Dulwich and District u3a has a duty of care to its membership. In order to ensure your safety we need to be able to contact someone who can meet your welfare needs in the event of an incident/accident. Dulwich and District u3a requests members to inform the person identified as your emergency contact that you have provided their details to the u3a. For certain events and trips we may need to provide these details to a third party. You will be made aware of who this emergency contact information will be shared with if it is to be shared outside of the u3a.

2.2 Necessity Test

The emergency contact information provided by members would only be used in the event of a serious incident/accident. Dulwich and District u3a would use the information to contact someone who may need to collect the relevant member, support the relevant member or liaise, on behalf of the relevant member, with a third party provider such as a medical professional. Dulwich and District u3a only requests minimal information regarding members' emergency contact which includes a name, telephone number and the details of their relationship to the member.

2.3 Balancing Test

The emergency contact data requested is minimal and is only that which is required to make contact with the individual in question. Dulwich and District u3a relies on its members to provide emergency contact information and to make the individual aware that this information has been passed to the u3a and for what purposes it has been passed to the u3a. Dulwich and District u3a will hold this information securely and it will only be accessed by those who need to see it. The information provided will only be used to contact the member's emergency contact where an incident or accident occurs that requires someone to take responsibility for the member in question. The data will not be processed for any other purposes.

Through compilation of this assessment Dulwich and District u3a considers that it has a legitimate interest to collect, hold and process emergency contact information. This document will be held by the trustees, accessible on the Dulwich and District website and communicated to the membership, as required. The assessment will be reviewed every 2 years in order to ensure that legitimate interest remains the most appropriate lawful basis for gathering this information.

Version	Date	Author	Approved by/date	Review date
1.2 (Part 1 only)	1 Dec 2020	Richard Elliott Anne Sharpley	Dulwich and District u3a Trustees 10 December 2020	December 2022
2.1 (Part 1 only)	8 Jan 2023	Anne Sharpley	Dulwich and District u3a Trustees 12 January 2023	January 2025
3.1 (Add Part 2)	2 May 2023	Anne Sharpley	Dulwich and District u3a Trustees 13 July 2023	July 2025

UK Registered Charity No 1188529