

EVESHAM & DISTRICT U3A

Data Protection Policy

1 Scope of the Policy

This policy applies to the work of Evesham & District U3A. The policy sets out the requirements that the Evesham & 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 (GDPR). The policy is reviewed on an ongoing basis by the Evesham & District U3A Executive Committee to ensure that we are compliant. This policy should be read in tandem with our U3A's Privacy Policy.

2 Why this Policy Exists

This data protection policy ensures that Evesham & 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 Committee Members, Group Leaders and Officials

- The only people able to access data covered by this policy should be those who need to communicate with or provide activities for Evesham & District U3A members.
- Evesham & District U3A will provide induction training to Committee Members, Group Leaders and Officials to help them understand their responsibilities when handling data.
- Committee Members, Group Leaders and Officials 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 the 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 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.

4 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; 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 they are 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 are inaccurate, having regard to the purposes for which they are processed, are 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 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 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.

5 Lawful, Fair and Transparent Data Processing

Evesham & District U3A requests personal information from potential members and members for membership applications and for sending communications about their involvement with the U3A. The forms used to request personal information will contain a privacy statement informing potential members and members 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 the U3A has with individual members. In addition members will be asked to provide consent for specific processing purposes. U3A members will be informed who they need to contact should they wish their data no longer 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 when the action has been taken.

6 Processed for Specified, Explicit and Legitimate Purposes

Members will be informed how their information will be used and the Executive Committee of Evesham & 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 Evesham & District 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 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

Evesham & District U3A will ensure that Group Leaders 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.

Evesham & District U3A will ensure that members' information is managed in a way that will not infringe an individual member's rights; these 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 Evesham & District U3A will only be asked to provide information that is relevant for membership purposes. This will include:

- name
- postal address
- email address
- telephone / mobile number(s)
- 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 why this information is required and the purpose for which it will be used.

Where Evesham & District U3A organises a trip or activity that requires next of kin or emergency contact 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 in order for photographs to be taken, and members will be told where the photographs will be displayed. Should a member wish at any time to remove their consent and to have their photograph removed, he/she should contact the Group Leader or a Committee member to advise that they no longer wish their photograph to be displayed.

9 Accuracy of Data and Keeping Data Up-to-date

Evesham & District U3A has a responsibility to ensure members' information is kept up to date. Members will be asked 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 the U3A of any changes in their personal information.

10 Accountability and Governance

The Evesham & District U3A Committee is responsible for ensuring that Evesham & District U3A remains compliant with data protection requirements and must be able to provide evidence that this is the case. Where consent is required for specific purposes, evidence of this consent (either electronic or paper) will be obtained and retained securely. The Evesham & District U3A Executive Committee will ensure that new members joining the Committee receive an induction into the requirements of GDPR and the implications for their role. Evesham & District U3A will also ensure that Group Leaders and Officials 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 will seek additional input from the Third Age Trust National Office should any uncertainties arise. The Committee will, on a regular basis, review data protection, who has access to information, and what data are held. When Committee Members, Group Leaders and Officials relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

11 Secure Processing

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

- Committee Members using strong passwords
- Committee Members not sharing passwords
- Restricting access to 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 or secure cloud systems when sharing data between Committee Members and/or Group Leaders
- Paying for firewall security to be put onto Committee Members' laptops or other devices.

12 Subject Access Request

U3A members are entitled to request access to the information that is held by Evesham & District U3A. The request needs to be received in the form of a written request to the Membership Secretary. On receipt, 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, meaning that the request cannot be granted. Evesham & 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.

13 Data Breach Notification

Should a data breach occur, action will be taken to minimise the harm. This will include ensuring that all Evesham & District Executive Committee Members are made aware that a breach has taken place and how the breach occurred. The Committee will then seek to rectify the cause of the breach as soon as possible in order to prevent any further breaches. The Chairman will notify National Office within 24 hours of the breach occurring. A discussion will take place between the Chairman and National Office about the seriousness of the breach, the action to be taken and, where necessary, the Information Commissioner's Office will be notified. The Committee will also contact the relevant U3A members to inform them of the data breach and the actions taken to resolve the breach.

Where a U3A member feels that there has been a breach by the 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 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 Committee who are not in any way implicated in the breach. Where the Committee needs support, or if the breach is serious, National Office should be notified. The U3A member should also be informed that he/she can report his/her concerns to National Office if he/she is dissatisfied with the response from the Evesham & District U3A. Breaches will be subject to a full investigation, records will be kept and all those involved notified of the outcome.