

DATA PROTECTION POLICY

Scope of the policy

This policy applies to the work of u3a Gosport. The policy sets out the requirements that u3a Gosport 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 to be reviewed on an ongoing basis by u3a Gosport committee members to ensure that we are compliant. This policy should be read in tandem with u3a Gosport's Privacy Policy.

1. Why this policy exists

This data protection policy ensures u3a Gosport:

- i. Complies with data protection law and follows good practice
- ii. Protects the rights of members
- iii. Is open about how it stores and processes members data
- iv. Protects itself from the risks of a data breach

2. General guidelines for Committee Members and Group Leaders

- i. The only people able to access data covered by this policy should be those who need to communicate with or provide a service to u3a Gosport members.
- ii. u3a Gosport will provide induction training to committee members and Group Leaders to help them understand their responsibilities when handling data.
- iii. Committee Members and Group Leaders should keep all data secure, by taking sensible precautions and following the guidelines below.
- iv. Strong passwords must be used and they should never be shared.
- v. Public computers should not be used for general access to members' data.
- vi. Data should not be shared outside of the u3a unless with prior consent and/or for specific and agreed reasons.
- vii. Members' information should be kept up to date. Members are asked to provide change of their contact details directly to the Membership Secretary
- viii. Additional support will be provided from the Third Age Trust where uncertainties or incidents arise.

3. 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
- **Principle 3** – The collection of personal data must be adequate, relevant and limited to what is necessary compared to the purposes for which data is collected
- **Principle 4** – Personal data held should be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that inaccurate personal data is erased or rectified without delay.
- **Principle 5** – Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.
- **Principle 6** – Personal data must be processed in accordance with the individuals' rights. 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.

Principle 1: Lawful, fair and transparent data processing

- i. u3a Gosport requests personal information from potential members and members for membership applications and for sending communications about their involvement with the u3a.
- ii. 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 what the information will be used for.
- iii. Members will be asked to provide consent for their data to be held and a record of this consent along with member information will be securely held
- iv. u3a members will be informed that they can, at any time, remove their consent and will be informed as to who to contact should they wish to do so.
- v. Once a u3a member requests not to receive certain communications this will be acted upon promptly and the member will be informed as to when the action has been taken.
- vi. The lawful basis for obtaining member information is due to the contractual relationship that u3a Gosport has with individual members.

Principle 2 : Processed for specified, explicit and legitimate purposes.

- i. Members will be informed as to how their information will be used and the Committee of u3a Gosport will seek to ensure that member information is not used inappropriately.
- ii. Appropriate use of information provided by members will include:
 - Communicating with members about u3a Gosport events and activities.
 - Group Leaders communicating with group members about specific group activities.
 - Consent will be sought in order to add member's 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
- iii. u3a Gosport 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.
- iv. u3a Gosport will ensure that member's 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.

Principle 3: Adequate, relevant and limited data processing.

- i. Members of u3a Gosport will only be asked to provide information that is relevant for membership purposes. This will include:
 - Name
 - Postal address
 - Email address (if applicable)

- Telephone number (s) – Landline and /or mobile numbers
 - Gift Aid entitlement
- ii. 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.
 - iii. Where u3a Gosport organises a trip or activity that requires next of kin information to be provided, a legitimate interest assessment (see Part 2)) will have been completed in order to request this information. Members will be made aware that the assessment has been completed.
 - iv. **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.
 - v. Should a member wish at any time to remove their consent and to have their photograph removed they should contact the person who took the photograph, the Group Leader or the Webmaster to advise that they no longer wish their photograph to be displayed.

Principle 4: Accuracy of data and keeping data up-to-date.

- i. u3a Gosport has a responsibility to ensure member's 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 u3a Gosport about any changes in their personal information.
- ii. During their membership members are asked to provide change of their contact details directly to the Membership Secretary.
- iii. Group Leaders will remind members to do this and occasionally ask members to check phone numbers and email addresses

Principle 5: Accountability and governance.

- i. The u3a Committee are responsible for ensuring that the u3a remains compliant with data protection requirements and can provide 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.
- ii. The u3a Committee will ensure that new members joining the Committee receive an induction into the requirements of GDPR and the implications for their role.
- iii. u3a Gosport will also ensure that Group Leaders are made aware of their responsibilities in relation to the data they hold and process.
- iv. Committee Members shall also stay up to date with guidance and practice within the u3a movement and shall seek additional input from the Third Age Trust National Office should uncertainties arise.
- v. The Committee will review data protection and who has access to information on a regular basis as well as reviewing what data is held.
- vi. When Committee Members and Group Leaders relinquish their roles, they will be asked to delete data that a new Committee Member/Group Leader can obtain themselves from the database. Other data eg NOK contacts/ health/ photograph permissions must be handed on securely and no copies of this information retained

Principle 6: Secure Processing.

u3a Gosport Committee Members and Group Leaders have a responsibility to ensure that data is both securely held and processed. This will include:

- i. Using strong passwords to have access to specific privileges within the membership Database.
- ii. Not sharing or passing on passwords which are linked to individual email addresses
- iii. Restricting access to member information to Committee or Group Leaders who need to communicate with members on a regular basis.
- iv. Installing virus protection on computers and other personal devices
- v. Not using a public computer for access to members' data.

4. Data Breach Notification

- i. If a data breach were to occur action shall be taken to minimise the harm. This will include ensuring that all u3a Gosport 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.
- ii. The Chair of the u3a Gosport shall contact National Office within 24 hours of the breach occurring 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 u3a members to inform them of the data breach and actions taken to resolve the breach.
- iii. 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.
- iv. Where the Committee needs 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.
- v. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

Signed

Date

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Next Review April 2023