

# Guildford Area U3A Data Protection Policy

## **SCOPE OF THE POLICY**

This policy applies to the work of Guildford Area U3A (hereafter GU3A). The policy sets out the requirements that GU3A has to gather personal 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. The policy is reviewed on an ongoing basis by GU3A committee members to ensure that this U3A is compliant. This policy should be read in tandem with GU3A's Privacy Policy.

## **WHY THIS POLICY EXISTS**

This data protection policy ensures that GU3A:

- Complies with data protection law and follows good practice.
- Protects the rights of members and partners.
- 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 LEADERS**

- The Executive Committee are responsible for overseeing GU3A policy.
- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the members of U3A.
- Data should not be shared informally or outside GU3A
- GU3A will provide induction training to committee members, faculty heads and group leaders to help them understand their responsibilities when handling personal data.
- Committee Members and group leaders 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.
- Personal data should not be shared outside GU3A unless with prior consent and/or for specific and agreed reasons.
- Member information should be reviewed and consent refreshed periodically 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.

## **DATA PROTECTION PRINCIPLES**

The General Data Protection Regulation identifies 8 data protection principles.

Principle 1 - Personal data shall be processed lawfully, fairly and in a transparent manner

Principle 2 - Personal data can only 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 for the purpose(s) data is collected for, however 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 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 are erased or rectified without delay.

Principle 5 – Personal data must kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for the 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 - 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.

**Lawful, fair and transparent data processing**

GU3A requests personal information from potential members and members for the purpose of sending communications about their involvement with GU3A. The lawful basis for obtaining member information is due to the legitimate interest and relationship that GU3A has with individual members. 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. 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. GU3A members will be informed that they can, at any time, remove their consent and told who to contact should they wish to do so. Once a GU3A 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.

**Data Processed for Specified, Explicit and Legitimate Purposes**

Members will be informed as to how their information will be used and the Committee of GU3A will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about GU3A's events and activities
- Group leaders communicating with their 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.

GU3A will ensure that group leaders are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending GU3A members marketing and/or promotional materials from external service providers.

GU3A 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 GU3A will only be asked to provide information that is relevant for membership purposes. This will include:

- Name.
- Postal address.
- Email address (and second email address where appropriate).
- Telephone numbers (landline and mobile).
- Previous occupation
- Gift Aid entitlement
- Whether you are prepared to help with subjects, clerical or organisation

Where additional information may be required, such as health-related information, this will be obtained with the specific consent of the member who will be informed why this information is required and the purpose that it will be used for. We do not hold financial data belonging to the membership (such as bank or credit card details).

Where GU3A organises a trip or activity that requires 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. There may be occasional instances where a member's data needs to be shared with a third party due to an accident or incident involving statutory authorities. Where it is in the best interests of the member or GU3A in these instances where GU3A has a substantiated concern then consent does not have to be sought from the member.

### **Photography**

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 Secretary or Public Relations Person to advise that they no longer wish their photograph to be displayed.

### **Accuracy of Data and Keeping Data up to Date**

GU3A 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 resubmit their personal information and reconfirm their consent for GU3A to communicate with them.

### **Accountability and Governance**

The GU3A Committee are responsible for ensuring that GU3A 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. The GU3A Committee will ensure that new members joining the Committee receive an induction into the requirements of GDPR and the implications for their role. GU3A will also ensure that group leaders 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. The GU3A Committee will review data protection requirements on an ongoing basis as well as reviewing who has access to date 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**

The committee members of the U3A have a responsibility to ensure that data is both securely held and processed. This will include:

- Committee members must use strong passwords.
- Committee members must not share passwords.
- Sharing member information must be restricted to those on the Committee who need to communicate with members on a regular basis.
- Laptops and PCs that contain or access personal information must be password protected.
- When data is shared between committee members and/or faculty heads and/or group leaders it must be password protected or on secure cloud systems
- Paying for firewall security to be put onto Committee Members' laptops or other devices.
- Ensuring blind cc. on relevant email correspondence and alerts.

The U3A has contracted for services from third party suppliers, with the following 3rd party data processors:

- Oakleaf for the purpose of mailing out the newsletter and the annual mailing of the new prospectus and AGM notice.

- Third Age Trust for the purpose of mailing out the TAT magazine.

The committee or TAT scrutinises the Terms and Conditions of each supplier and judges that they are GDPR compliant.

**Subject Access Request**

GU3A members are entitled to request access to the information that is held by GU3A. The request needs to be received in the form of a written request to the Membership Secretary of GU3A. On receipt of the request, the request will be formally acknowledged and dealt with within 21 days unless there are exceptional circumstances why the request cannot be granted. GU3A 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 GU3A 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 GU3A shall contact the National Office within 24 hours of the breach occurring. 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 GU3A members to inform them of the data breach and actions taken to resolve the breach.

If a GU3A member contacts the U3A to say that they feel that there has been a breach by GU3A, a committee member will ask the member to provide an outline of their concerns. If the initial contact is by telephone, the committee member will ask the GU3A 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 GU3A 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

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