

## Data Protection Policy - New Milton u3a

### 1 Scope of the policy

- This policy applies to the activities of New Milton u3a.
- The policy sets out the requirements of New Milton u3a in collecting and processing 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 (GDPR).
- The policy is reviewed on an ongoing basis by New Milton u3a Committee to ensure that New Milton u3a remains compliant.
- This policy should be read in tandem with New Milton u3a's Privacy Policy.

### 2 Why this policy exists

This data protection policy ensures that New Milton 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 and Group Leaders

- New Milton u3a stores members' data on a secure database.
- The only people able to access data covered by this policy should be those who need to communicate with, or provide a service to, New Milton u3a members.
- New Milton u3a will provide induction training to Committee Members and Group Leaders to help them understand their responsibilities when handling 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.
  - 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 (if applicable) 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 available from the Third Age Trust where uncertainties or incidents regarding data protection arise.
  - No member's name may be mentioned in any press report.

### 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 inaccurate personal data, having regard to the purposes for which it is processed, is 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 for which the personal data is 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**

- New Milton 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 the reason for its use.
- The lawful basis for obtaining member information is due to the legitimate interest relationship that New Milton u3a has with individual members. This is covered within the document: Legitimate Interest Assessment - Membership.
- In addition, members will be asked to provide consent for specific processing purposes such as the taking of photographs.
- New Milton 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**

New Milton u3a Committee will inform members as to how their details will be used and will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about New Milton u3a events and activities.
- Group Leaders communicating with group members about specific group activities.
- Members' names and addresses 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 arise during the course of their membership.

New Milton 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, for example commercial companies or individuals advertising their services.

New Milton u3a will ensure that members' information is managed in such a way as not to infringe an individual member's 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 New Milton 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, if applicable.

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 for its use.

Where New Milton u3a organises a trip or activity that requires emergency contact information to be provided, a legitimate interest assessment has been completed in order to request this information. This is covered by the document: Legitimate Interest Assessment - Emergency Contact.

## **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 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 Membership Secretary or email [membership.newmiltonu3a@gmail.com](mailto:membership.newmiltonu3a@gmail.com) to advise that they no longer wish their photograph to be displayed.

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

- New Milton u3a has a responsibility to ensure members' information is kept up to date.
- Members should advise the Membership Secretary when any personal information changes.
- Members will be able to use the Beacon Portal Guide to update their own details.
- The membership renewal process will provide a further opportunity for members to check or update their details.

## 10 Accountability and governance

- New Milton u3a Committee is responsible for ensuring and demonstrating that the u3a remains compliant with data protection requirements.
- Where members' consent is required, then evidence of this consent will be obtained (electronically or on paper) and retained securely.
- New Milton u3a Committee will ensure that new Committee Members receive an induction into the requirements of GDPR and the implications for their role.
- New Milton u3a 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.
- New Milton u3a Committee will review data protection requirements on an ongoing basis as well as reviewing who has access to data and how it is stored and deleted.
- When Committee Members and Group Leaders relinquish their roles, they will be asked either to transfer data, both current and historical, to their successor and/or delete it. Access to New Milton u3a's database will be withdrawn within a reasonable period of time if this is no longer needed.

## 11 Secure Processing

New Milton Committee Members have a responsibility to ensure that data is both securely held and processed. This will include:

- Committee Members and Group Leaders using strong passwords
- Committee Members and Group Leaders not sharing passwords
- Restricting access to, or sharing of, member information to those on the Committee and Group Leaders 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 Committee Members and/or Group Leaders.

## 12 Subject Access Request

- Members are entitled to request access to their personal information that is held by New Milton u3a. The request needs to be made in writing to the Membership Secretary of New Milton u3a.
- On receipt of the request, it will be acknowledged formally and dealt with expediently (the legislation requires that information should generally be provided within one month) unless there are exceptional circumstances as to why the request cannot be actioned.
- New Milton u3a will provide a detailed written response (electronically or on paper).

- A record shall be kept of the dates of both the request and 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 New Milton u3a 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 New Milton u3a will notify the National Office as soon as possible after the breach occurred. A discussion will take place between the Chair and National Office as to the severity of the breach, the action to be taken and, where necessary, the Information Commissioner's Office would be notified.
- The Committee shall also contact those affected to inform them of the data breach and any actions taken for its resolution.
- Where a u3a member feels that there has been a breach by the u3a, a Committee Member will ask for pertinent details. 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, and offer to meet with the member in person.
- 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 the National Office.
- The u3a member should also be informed that they can report their concerns to the 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.

Date Adopted: 4 July 2023

Signed: ..... (Chair)

Review date: September 2026