



## Northumbria Region U3A (NRU3A) Policies 2019

### Data Protection Policy

#### Scope of the policy:

This policy applies to the work of NRU3A. The policy sets out the requirements that NRU3A 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 NRU3A committee members to ensure that the NRU3A is compliant. This policy should be read in tandem with the NRU3A's Privacy Policy.

#### Why this policy exists:

This data protection policy ensures that the NRU3A:

- 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.

#### General guidelines:

- 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 NRU3A .
- Data should not be shared informally or outside of NRU3A
- NRU3A will provide induction training as appropriate to help them understand their responsibilities when handling personal data.
- They 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 of the NRU3A unless with prior consent and/or for specific and agreed reasons.
- Member information will be reviewed and consent refreshed annually or when policy is changed.

#### 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 compared to the purpose(s) data is collected for.

**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 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.

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**Principle 7** - 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 8** - Personal data cannot be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the processing of personal data.

### Lawful, fair and transparent data processing:

NRU3A requests personal information from potential members and members for the purpose of sending communications about their involvement with NRU3A. 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. 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. NRU3A 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. Once a NRU3A 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.

### Processed for Specified, Explicit and Legitimate Purposes:

Members will be informed as to how their information will be used and the Committee of NRU3A will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with member U3As about NRU3A's events and activities
- Communicating with member U3As about their membership and/or renewal of their membership.

Distributors should contact the committee before sending out any information.

NRU3A will ensure that members' information is managed in such a way as to not infringe an individual members rights.

### Adequate, Relevant and Limited Data Processing

Members of NRU3A will only be asked to provide information that is relevant for NRU3A membership purposes. This will include:

- Name.
- Postal address.
- Email address.

### Secure Processing

The committee members of NRU3A have a responsibility to ensure that data is both securely held and processed.

This will include:

- Using password protection on laptops and PCs that contain or access personal information.
- Using password protection or secure cloud systems when sharing data between committee members
- Always send emails by BCC, with indication of recipients within the body of the email

### Subject Access Request

Representatives of member NRU3A are entitled to request access to the information that is held by NRU3A. The request needs to be received in the form of a written request to the committee. On receipt of the request, it will be formally

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acknowledged and dealt with within 14 days unless there are exceptional circumstances as to why the request cannot be granted. NRU3A 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 shall be taken to minimise the harm by ensuring all committee members are aware that a breach had taken place and how the breach had 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 NRU3A shall contact National Office within 24 hours of the breach occurring to notify of the breach. A discussion would 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 NU3ASN members to inform them of the data breach and actions taken to resolve the breach.

If a representative of a member NRU3A member contacts NRU3A to say that they feel that there has been a breach by NRU3A, 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 representative of the NRU3A member to follow this up by detailing their concern in writing. The concern 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 NRU3A member should also be informed that they can report their concerns to National Office if they don't feel satisfied with the response. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.