

## Seaford u3a: Data Protection Policy

### 1. Scope of the policy

This policy applies to the work of Seaford u3a. The policy sets out the requirements for collecting and processing information for membership purposes by Seaford u3a. The policy details how personal information will be collected, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by the Seaford u3a Committee to ensure that Seaford u3a remains compliant. This policy should be read in tandem with the Seaford u3a Privacy Policy.

### 2. Why this policy exists

This data protection policy ensures that Seaford 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

General guidelines for Committee Members and Group Leaders:

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to Seaford u3a members.
- Seaford 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 good practice guidelines below.
- Strong passwords must be used and they should never be shared.
- Data should not be shared outside of Seaford 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 Third Age 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.

### 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. Further processing for archiving purposes in the public interest, for scientific or historical research purposes or for 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 for 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, for scientific or historical research purposes or for 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 with 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.

#### **4. Lawful, fair and transparent data processing**

Seaford u3a requests personal information from potential and current members for membership applications and for sending communications regarding members' involvement with the u3a. Members will be informed of the reason 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 (such as the taking of photographs). Seaford u3a members will be informed who they need to contact should they wish their data not to be used for specific purposes for which they previously 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.

#### **5. Processed for specified, explicit and legitimate purposes**

Members will be informed as to how their information will be used and the Committee of Seaford u3a will seek to ensure that members' information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about Seaford u3a events and activities
- Group Leaders communicating with group members about specific group activities
- Members' information provided to the distribution company that sends out the Trust publication, *Third Age Matters*. Members will be informed of this and have the choice 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 the renewal of their membership.

- Communicating with members about specific issues that may have arisen during the course of their membership

Seaford u3a will ensure that Group Leaders are made aware of what would be considered appropriate and inappropriate communication: this would include sending u3a members marketing and/or promotional materials from external service providers.

Seaford u3a will ensure that members' information is managed in such a way as to not 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

#### **6. Adequate, relevant and limited data processing**

Members of Seaford u3a will only be asked to provide information that is relevant for membership purposes. This will include:

- Name
- Postal address
- Email address
- Telephone number(s)
- Gift Aid entitlement

Where additional information, such as health-related information, may be required 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.

Where Seaford u3a organises a trip or activity that requires next of kin information to be provided, a legitimate interest assessment will be completed in order to request this information. Members will be made aware that the assessment has been completed..

#### **7. 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 his or her consent and to have a photograph removed the member should contact the Webmaster and/or the Publicity Officer, as appropriate, to advise that he or she no longer wishes the photograph(s) to be displayed.

#### **8. Accuracy of data and keeping data up-to-date**

Seaford u3a has a responsibility to ensure members' information is kept up to date. Members will be advised to let the Membership Secretary know if any of their personal information changes.

In addition, the annual membership renewal process will provide an opportunity for members to inform Seaford u3a of any changes in their personal information.

#### **9. Accountability and governance**

Seaford u3a Committee are responsible for ensuring that the u3a 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. Seaford u3a Committee will ensure that new Committee Members receive an induction into the requirements of GDPR and the implications for their role.

Seaford 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 good practice and will seek advice from the Third Age Trust National Office should any uncertainties arise. Seaford u3a Committee will review data protection requirements on an on-going basis as well as reviewing who has access to data and how data is stored and managed. When Committee Members and Group Leaders relinquish their roles, they will be asked to either pass data on to those who need it and/or delete data.

#### **10. Secure Processing**

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

- Committee Members using strong passwords
- Committee Members not sharing passwords
- Restricting access to members' information to those on the Committee who need to communicate with members on a regular basis
- Using password protection on computers and other devices that contain personal information
- Using password protection, a membership database or secure cloud systems when sharing data between Committee Members and/or Group Leaders
- Ensuring firewall security installed on Committee Members' computers or other devices, and paying for this if appropriate

#### **11. Subject Access Request**

Seaford u3a members are entitled to request access to the information that is held by Seaford u3a. The request needs to be received in the form of a written request to the Membership Secretary of Seaford u3a. On receipt of the request, the request will be formally acknowledged and dealt with promptly (the legislation requires that information should generally be provided within one month) unless there are exceptional circumstances as to why the request cannot be granted. Seaford 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.

#### **12. Data Breach Notification**

Were a data breach to occur action will be taken to minimise the harm. This will include ensuring that all Seaford 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 Seaford u3a will contact National Office as soon as possible after the breach has occurred to notify them of the breach. A discussion will take place between the Chair and National Office as to the seriousness of the breach and the action to be taken. Where necessary, the Information Commissioner's Office would be notified. The Committee shall also contact the relevant Seaford u3a members to inform them of the data breach and actions taken to resolve the breach.

Where a member feels that there has been a breach by the Seaford u3a, a Committee Member will ask the member concerned 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 letter detailing his or her 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 or she can report the concerns to National Office if he or she does not 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.

**The above Policy was adopted by Seaford u3a**

*On:* 14 December 2020

*Signed:* 

*Print name:* Les Fothergill

*Committee role:* Chairman

**Review of the above undertaken three years from the above date:**

*On:* \_\_\_\_\_ (*date*)

*Signed:* \_\_\_\_\_ *Committee role* \_\_\_\_\_

*Print name:* \_\_\_\_\_